

## INFORMATION NOTE

### on the processing of personal data of visitors to Vastint buildings

**VASTINT ROMANIA S.R.L.** (hereinafter referred to as "**Vastint**", "**we**", "**us**" or a similar name) is a limited liability company registered in Romania, having its registered office at Splaiul Unirii no. 165, TN Offices Building 1, 1st floor, office 1, 030 133, Bucharest, Romania, registered with the Trade Register under no. J40/20635/2008, unique registration code RO24850050.

Vastint is the owner of the Business Garden Bucharest (**BGB**) office buildings (the "**Buildings**", the "**Building**"). In this capacity, Vastint collects and processes several categories of personal data from people who enter the premises of the Buildings: employees of companies that have rented space in the Building, suppliers, service providers, visitors, etc. (hereinafter referred to as "**visitors**", "**you**" or "**your**").

This Notice describes our policies and practices regarding our collection and use of your personal data in connection with your access to the Buildings and describes your rights as a data subject.



#### The data we process

We collect and use any of the following data about you:



#### Processing carried out at access points in buildings:

- **For persons who have access to office buildings on the basis of the access card [issued by Vastint and assigned by tenant entities by name]** the following categories of data are processed:
  - the unique identifier of the access card, comprising the name tenant company or an acronym of the tenant company + numeric characters;
  - employer/employee (the entity for which the access card has been authorised);
  - access logs (access card series, time of card scan, the unique identifier assigned to the card, the card reader used);
- **For visitors (people without an access card), via the building reception and at access points, including car parks, staffed with security and protection personnel (if applicable),** the following categories of data are processed through the access register of persons or vehicles:
  - surname and first name (of the driver of the vehicle, in the case of access to the building's parking lot);
  - car no. (in case of access to the building's car park);
  - iD number and number;
  - destination;
  - arrival time;
  - departure time;
  - comments (in so far as they constitute or include data of a personal nature)



## Processing by video surveillance system (CCTV):

- image of visitors (video recordings by the system's fixed cameras video surveillance of the building).
- image of the vehicle registration number (images captured by the LPR number plate recognition system in operation in the building's car park)



## When and how we collect data

Data is collected when you enter the building, in the pedestrian area or with a vehicle, through the video surveillance system, through the card access system or directly from you to the security staff or reception.



## Why we use this data

The data processed through the access registers are processed pursuant to the **legal obligations** imposed by the Methodological Norms of Law 333/2003 on the security of objectives, goods, values and the protection of persons (which make it obligatory to keep records of the access of persons and vehicles to the Building).

We also have a **legitimate interest in** ensuring the safety and security of the Building, property and people on Vastint premises, as well as the efficient management of the use of parking spaces, so the video recording system (CCTV) and the parking access control system (LPR) are operated on this basis.

Aspects relating to the way in which the security of the Buildings is ensured and configured are contained in security plans approved by the competent institutions.



## Data retention period

Personal data is processed only for the specified purposes and is kept only as long as necessary to fulfil the purposes for which the information is collected:



- For processing carried out in connection with access logs, via security staff and building reception staff, at access points in the building, data are kept for a period of 2 years, according to the provisions of Law 333/2003; For the processing of data related to the card access system the data are stored on local servers related to the reading systems and are overwritten until they reach full capacity. The same retention period applies to data related to the LPR system in operation in car parks.



- For processing carried out by the video surveillance system, the data are kept for a period of 30 days from the date of recording. If an incident is recorded, the footage of those incidents is retained until the incident is resolved (including related legal proceedings).



## Who else has access to your data.



### Data sharing within the Vastint/Interogo group

- Personal Data may be shared with any other company that is a member of our group, if we consider this to be in our legitimate interest for internal administrative purposes (e.g. data storage) or for auditing and monitoring our internal processes.



### Security company

- We use the specialised services of a licensed security company to provide security services. They are the ones who record data in the access logs and monitor the CCTV system.

### • • • Other entities

- We may disclose your data to entities that administer the Building to the extent necessary in light of their status as administrators and related legal obligations or administrative purposes.
- We may also disclose your personal data to third parties in the following situations:
  - if you request or agree to this;
  - persons who can demonstrate that they have the legal authority to act on your behalf;
  - where it is in our legitimate interest to do so in order to administer, expand or develop the business (e.g. if Vastint, or a substantial part of its assets, is acquired by a third party, in which case personal data held by Vastint will constitute one of the transferred assets);
  - where we are required to disclose your personal data to comply with a legal obligation or a request from the authorities;
  - to protect the rights, property or safety of the Building, Vastint, its employees, its customers, suppliers or others, or to prevent any illegal activity.



## Your options and rights

### Your options



You can choose not to provide us with the data needed to complete the records of reception or access of persons or vehicles. In this case, you must understand that we cannot allow you to enter the Building.

### Your rights

You can exercise your rights by sending an email to [info.romania@vastint.eu](mailto:info.romania@vastint.eu)



### You have the right to access the information we hold about you.

- You may request information about the personal data we hold about you, including information about the categories of data we hold or control, what it is used for, how long it is processed and to whom it is disclosed, if at all.
- According to Vastint policy, we cannot provide you with copies of records captured by the surveillance system, but in exceptional circumstances and subject to the resolution of a justified request, we may provide you with the relevant images requested, in accordance with applicable law and with

respect for the individual rights and freedoms of others or third parties.



**You can ask us to correct incorrect information we process about you.**



**You can obtain from us the restriction of data processing your personal**

This right is applicable if:

- you contest the accuracy of your personal data and you request that we verify its accuracy,
- your data has been unlawfully processed but rather than request erasure, you wish to restrict processing,
- we no longer need the personal data but the you need us to keep it in order to establish, exercise or defend a legal claim; or
- you have objected to us processing your data, and we are considering whether our legitimate grounds override yours.



**You have the right to ask us to delete data processed about you.**

This right is applicable if:

- the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- the data subject objects to the processing for reasons relating to his or her particular situation;
- the personal data have been unlawfully processed;
- personal data must be deleted to comply with a legal obligation of the controller.

unless the data are necessary:

- for exercising the right of freedom of expression and information;
- to comply with a legal obligation we have;
- for archiving purposes in the public or scientific interest or for studies for historical or statistical purposes; or
- for the establishment, exercise or defence of legal claims.



**You can object to the processing of your data.**

You may object - at any time - to the processing of your personal data for reasons relating to your particular situation, provided that the processing is based on our legitimate interests or those of a third party.

- In this case we will no longer process your personal data, unless (i) we can prove compelling legitimate grounds for processing which override your interests, rights and freedoms, or (ii) or if the purpose is the establishment, exercise or defence of legal claims.
- If you object to the processing, please specify whether you also want your personal data to be deleted, otherwise we will only restrict it.



**You have the right to lodge a complaint about how we process your data**

If you have a complaint, please let us know first so that we can try to remedy the situation. If we fail, you can contact the National Authority for the Supervision of Personal Data Processing through the procedure described on their website: [www.dataprotection.ro](http://www.dataprotection.ro)



**Please note:**

- **Time period:** We will respond to your request within 30 days, which may be extended for up to 2 additional months for specific reasons related to your rights or the complexity of your request. In any case, if this period is extended, we will notify you of the extension period and the reasons for the extension.
- **Impossibility of identification:** In some cases, we may not be able to identify your personal data because of the identifiers you provide in your application. In such cases, if we cannot identify you as a data subject, we may not act on your request under this section unless you provide us with additional information that allows us to identify you. We will keep you informed and give you the opportunity to provide us with such further details.



## **Amendments concerning the information note**

This information notice may be amended whenever we deem it necessary, and will be made known to you by any feasible means of communication, including keeping it at our access points and posting it on our website.



**Thank you for reading this document!**