

Vantage Towers Privacy Notice

(Art. 13 and 14 of the General Data Protection Regulation (GDPR))

Date: 11.06.2024

This privacy notice applies once you conclude a property related agreement with Vantage Towers SRL such as for example: sales agreements, lease or sub-lease agreements, right of use agreements, buy out agreements etc., hereinafter referred to as "the Contract"). You can access this privacy notice at any time on our website here: <https://www.vantagetowers.com>

1. Data Controller - who is responsible for data processing

Vantage Towers SRL

Address: București, Str. Barbu Văcărescu nr. 201, Mezanin, Sala 1, sector 2, cod poștal 020276, Romania

E-Mail: info@vantagetowers.com with the addition: "For Vantage Towers Romania"

2. Contact the Vantage Towers Group Data Protection Officer

Vantage Towers AG - with the addition : A/C: " To the Data Protection Officer"

Address: Prinzenallee 11-13, 40549 Düsseldorf, Germany

E-Mail: privacy@vantagetowers.com

3. Personal data we process

We process the following personal data:

- Your contact details, such as name, family name, address, telephone number, fax number, email address, mobile phone number;
- Payment data, as necessary to process payments and prevent fraud;
- Any other information necessary for the performance of the Contract or/ and that you have voluntarily provided to us, such as any applications or other data relating to any property;
- Information that is publicly available or accessible from credit agencies or other information database, in particular information from sanction lists and/or land register entries;
- Data related to your participation in surveys, such as information about the surveys you have
- Your photographs, digital images and sound, captured and processed through technical means allowing your unique identification or authentication.

4. Purpose and legal basis for processing your personal Data

We process your personal data for the following purposes:

1. To fulfill the Contract to which you are party;
2. To communicate with you and other third parties in relation to the Contract (for example to renew the contract, to inform you about the termination, to negotiate the contractual clauses etc.);
3. To plan, execute and administer our Contract (for example for the purpose of internal accounting, invoicing, undertaking maintenance or repairs etc.);
4. To comply with legal archiving obligations (e.g. tax and commercial retention obligations) and, if applicable, resolve any disputes, pursue and file for any claims or defend any claims made against us;
5. To ask you to participate to our landlords' satisfaction surveys regarding our collaboration for service improvement purposes. These surveys are in the form of a questionnaire and can be sent to you through company's applications, via email, or they could be conducted through outgoing telephone calls. They can also be carried out by an external partner. In case you choose to participate in a survey, we will analyze your answers and may contact you;
6. To promote and communicate to the general public, initiatives carried out by us or a national or foreign company of the economic group in which we are integrated involving the owners of real estate with whom contractual relations are already established or are intended to be established (brand marketing);
7. To comply with the current regulatory framework for corporate governance. In context of our compliance with the current regulatory framework, we are obliged to have in our organizational structure an Internal Audit unit and a Regulatory Compliance unit, which within their responsibilities can process your personal data;
8. To select you for participating in our satisfaction surveys and in contract -related initiatives and contact you. We process a limited range of your personal data and specifically contract data (personal data, payment data, information related to the contract that you have provided to us).

The processing of your personal data, for the purposes **No. 1-4**, is necessary to fulfill the Contract to achieve the objective established in this Clause, to which you are party including its execution. The legal basis for processing your personal data for the purposes **No. 1-4**, is Art. 6 (1) b) and f) GDPR.

The processing of your personal data for the purpose **No. 5**, should you choose to participate in a satisfaction survey, and for the purpose **No. 8**, is based on our legitimate interests, Art. 6(1) f) GDPR.

The specific types of processing based on our legitimate interests, are carried out after careful weighing of our legitimate interest in relation to the need to protect your personal data and are limited to the absolutely expected and necessary processing, which is compatible with our relation.

The processing of your personal data for the purpose **No. 6** is based on your consent, Art. 6 (1) a) GDPR. We will not process your biometric data under any circumstances, unless we request for your consent and you provide it to us.

The processing of your personal data for the purpose **No. 7** is based on our legal obligation, Art. 6(1) c).

5. Storage period for personal Data

- Your personal Data will be stored for the duration of the Contract and thereafter until the end of the applicable statute of limitations being six(6) years. Your personal Data will thereafter be deleted, unless we are either legally obliged under Art. 6 (1), c) GDPR to document and archive your personal Data for a longer period in order to comply with any applicable tax laws or commercial laws; or you have lawfully consented to a longer storage period in accordance with Art. 6 (1),a) GDPR.
- Your photographs, digital images and sound will be stored for as long as the promotion and communication initiatives are taking place, maximum storage period is one (1) year starting from the date of publication, unless you withdraw your consent. In the case you withdraw your consent, at any time, we will immediately cease processing your biometric data. The withdrawal of your consent has a future effect and does not affect the lawfulness of the processing of your biometric data before its withdrawal.
- Survey data is retained for one (1) year from the date of your participation in it.

6. Data subjects' rights

As a data subject, you have the following rights in accordance with Art. 12 et seq. GDPR:

- request information as to your personal data we process (Art. 15 GDPR);
- request to rectify any inaccurate personal data or supplement any uncompleted personal data (Art. 16 GDPR); and
- subject to fulfilling the legal requirements, request erasure or restriction of processing of your personal Data as well as invoke the right to data portability (Art. 17, 18 und 20 GDPR).
- If we process your personal Data based on your consent, you have the right to withdraw this consent at any time with effect for the future. The withdrawal of consent does not affect the lawfulness of processing based on consent before your withdrawal.

You can withdraw your consent either via post, sending a letter under the title **"Consent withdrawal"** with the addition **:"To the Data Controller"** to the address: București, Str. Barbu Văcărescu nr. 201, Mezanin, Sala 1, sector 2, cod poștal 020276, Romania

or

via email under the title **"Consent withdrawal"** with the addition **"To the Data Controller"** to the address: privacy@vantagetowers.com stating your name and how and to which address you would like to receive the reply.

If we process your personal Data for the purposes of our legitimate interests (Art. 6 (1),f) GDPR), you have the right to object to processing. If you claim your right to object, we will no longer process your personal Data, unless we demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims.

If you claim any of your data subject rights, we will analyze whether the legal preconditions are met.

Please address your request to our Group Data Protection Officer either via post to the address: Prinzenallee 11-13, 40549 Düsseldorf, Germany with the addition "To the Data Protection Officer" and with the indication: "Exercise of GDPR Rights"

or

via email to the address privacy@vantage-towers.com with the addition: "To the Data Protection Officer" and the indication: " Exercise of GDPR Rights", stating your name and how and to which address you would like to receive the reply.

In case you think that we have not sufficiently satisfied your request and the protection of your personal data is affected in any way, you can submit a complaint to the Data Protection Authority **Autoritatea Națională de Supraveghere a Prelucrării Datelor cu Caracter Personal** <https://www.dataprotection.ro>, postal address: B-dul G-ral. Gheorghe Magheru 28-30 Sector 1, cod postal 010336 Bucuresti, Romania (Art.77 GDPR).

We will respond to your requests free of charge within one month of receiving the request. In exceptional cases this deadline may be extended for two (2) months if required due to the complexity of your request. In any case, we will inform you about this extension and the reason for the delay.

If we consider that your request is manifestly unfounded or excessive, we reserve the right to request a reasonable fee for its satisfaction, taking into account the administrative costs for its execution or even to refuse to follow up on your request.

7. Recipients or categories of recipients

We will transfer your personal data may be passed on to third parties, if necessary for the performance of the contract, for the performance of the satisfaction surveys, for the performance of selected contract related initiatives, being:

- Vantage Towers Group companies;
- Vodafone Group companies; and
- Third parties outside these Groups who are involved as service providers/data processors.

We will transfer your biometric data to third parties, if necessary for the public promotion and communication of Vantage Towers or a national or foreign company of the economic group in which Vantage Towers is integrated, initiatives regarding the owners of real estate (Clause 4, par.6), being:

- Vantage Towers Group companies;
- Vodafone Group companies; and
- Third parties outside these Groups who are involved as service providers/data processors.

Eventually we may transmit personal Data to countries outside the European Economic Area ("third countries"), which do not provide for the same data protection level. Unless there is an adequacy decision – pursuant to Art. 45 GDPR – by which the European Commission determines an adequate level of protection in the respective third country, we have taken measures to ensure adequate and appropriate safeguards for the protection of your personal data. These include so-called EU standard contractual clauses that have been concluded with the recipients of the personal data and that provide for appropriate safeguards, pursuant to Art. 46 GDPR. If a transfer to companies belonging to the group is

necessary for the execution of the Contract and or for the execution of the promotional and communication initiatives (brand marketing) , this is secured by corresponding reciprocal agreements.

We transfer your personal data to the following categories of service providers listed according to the respective service provider's task area:

- **Acquisition:** acquisition service providers for the purpose of negotiation contracts;
- **Planning:** planning service providers for the purpose of establishing network plans or other construction plans;
- **Construction:** construction service providers such as civil engineering, steel construction, electrical engineering, air conditioning, building technology, construction management;
- **In-life-management:** monitoring service providers;
- **Maintenance:** maintenance service providers;
- **Property management:** property management service providers;
- **Energy:** energy service providers; and
- **IT:** IT service providers.
- **Marketing:** brand marketing agencies, communications campaign agencies, media strategic planning service providers, customer satisfaction survey service providers

8. What are the steps we take to protect your data

We apply the appropriate technical and organizational measures in our business processes and systems and platforms used to collect, process or use the data. The same obligations are ensured that are fulfilled by our service providers over the data processing agreements that we have entered into with them(Art.28 GDPR). We remain the Controller of the personal data being processed.