

PRIVACY NOTICE

RELATED TO THE CAR PARKING MANAGEMENT AND LICENSE PLATE RECOGNITION SYSTEMS AT PARKLAKE SHOPPING CENTRE

In this Privacy Notice, we describe what we do with your personal data when you use our parking garage and interact with the ticket-based service as well as the license plate recognition system (“LPR”) to access and exit the underground garage of ParkLake Shopping Centre located at 4 Liviu Rebreanu Street, district 3, Bucharest, Romania (hereinafter the “Shopping Center”).

I. WHO IS THE CONTROLLER FOR PROCESSING YOUR DATA?

The controller in relation to all data processing activities related to the ticket-based access service as well as the LPR system is **Parklake Shopping S.A.** (hereinafter referred to as the “Controller” or “Parklake”).

You may contact us for data protection concerns and to exercise your rights, as follows:

Parklake Shopping S.A.,

4 Liviu Rebreanu Street, ParkLake Shopping Center, 2nd level, Administrative Offices, office no. 6

3rd district, Bucharest, Romania

email: dataprotection@parklake.ro

II. WHAT DATA DO WE PROCESS?

In relation to our parking access systems, we process various categories of data about you. The main categories of data are the following:

- **Parking related data** (static photos of entry, exit and transfer times of vehicles).
- **License plate information** (registration number, country of origin).
- **Legally and contractually required data**, as follows:
 - For **short term parking access** - the parking ticket’s unique serial number; details regarding date; hour and location of the entry; time stamp and location of the automatic payment machine; value of the transaction.).
 - **Long-term parking access** (such as the holder’s name, license plate number, e-mail address, ID series and number, national identification number (CNP for individuals), fiscal code, or company details (for legal entities) etc.
- **Communication data:** When you are in contact with us via the contact form available on our website, by e-mail, telephone, or by letter or other means of communication, we collect the data exchanged between you and us, including your contact details and the metadata of the communication.

III. PURPOSES AND LEGAL GROUNDS FOR PROCESSING DATA

We process data for the following purposes:

- Conclusion, administration, and performance of a contractual relationship, in relation to the offering of parking services.
- For communicating with you, in relation to responding to inquiries and the exercise of your rights and to enable us to contact you in case of queries.

- Complying with laws, directives and recommendations from authorities and internal regulations.

The legal basis for the processing of personal data is represented by ParkLake's legitimate interest to provide an efficient and well-functioning vehicle access system into the underground parking garage, according to art. 6 (1) f) GDPR. Likewise, our legitimate interests also include compliance with legal regulations, insofar as this is not already recognized as a legal basis by applicable data protection law, as well as to ensure an organized coordination of traffic through our parking garage, especially to maintain a constant flow without unwanted incidents at the entry and exit gates.

IV. WITH WHOM DO WE SHARE YOUR DATA?

We might share personal data with entities that provide services to us in relation to the management and upkeep of the parking garage and related systems, including IT & Security services and other types of consulting services, as well as other external advisors or public authorities, including but not limited to:

- Neutronix S.R.L. – service provider of the SKIDATA LPR system.
- STSA Net Consulting S.R.L. – service provider that ensures the coordination of the parking operational services.
- Securitas Services Romania S.R.L. – security service provider for the parking garage.
- Sierra Romania Shopping Centers Services S.R.L. – property manager and parking coordinator service provider for ParkLake.
- Public authorities (police authorities and/or judicial authorities).

V. FOR HOW LONG DO WE PROCESS YOUR DATA?

We process your data for as long as required for our processing purposes, the legal retention periods and our legitimate interests in documentation and keeping evidence or technical requirements.

Images captured by the LPR system, as well as the short-term ticket access logs are stored for a period of 20 days, after which automatic erasure takes place. However, in case of specific situations, such as when the authorities require copies of such records, for the purpose of investigating a potential criminal offence, the storage period is extended until the delivery of the copy to the authority requesting it.

For long-term parking, the information provided for the purpose of the provision of parking services is stored for the duration of the parking services contracts, and subsequently kept for a period of 5 years after the financial year in which the contract ends, for tax compliance purposes.

VI. HOW DO WE PROTECT YOUR DATA?

We take strong security measures to maintain the required security of your personal data and ensure its confidentiality, integrity, and availability, and to protect it against unauthorized or unlawful use, disclosure, or access.

VII. WHAT ARE YOUR RIGHTS?

To help you control the processing of your personal data, you have the following rights in relation to our data processing:

- a. **Right of access** - You have the right to obtain from us, based on a written request, information relating to personal data we hold about you, including a copy of your personal data that we process.

- b. **Right to rectification** - You can have your personal data rectified by us if they are incorrect or incomplete.
- c. **Right to erasure** - You have the right to request us to erase personal data we process about you in the following situations:
 - Personal data are no longer necessary for the purposes for which they were collected or processed.
 - you withdraw your consent to the processing of personal data and there is no other legal basis for the processing.
 - you object to the processing of personal data and there are no legitimate grounds for the processing.
 - personal data have been processed unlawfully.
 - personal data must be deleted to comply with a legal obligation incumbent on us.

except where the data is necessary:

 - for the exercise of the right to freedom of expression and information.
 - to comply with a legal obligation that binds us.
 - to achieve purposes in the public interest, for scientific or historical purposes or for statistical purposes; or
 - for the purpose of instituting, prosecuting, or defending legal proceedings.
- d. **Right to restriction** of processing - You may obtain from us the restriction of the processing of personal data if: you dispute the accuracy of your data; the processing is unlawful, and you object to the deletion of the data; we no longer need the data, but you ask us to keep it for the establishment, exercise, or defence of legal claims; while we check whether our legitimate reasons outweigh your rights as a data subject if you object to the processing.
- e. **Right to object** - You have the right at any time to object to the processing of your personal data because of your specific situation, provided that the processing is based on our legitimate interests or those of a third party. The right to object can be exercised by submitting a request to this effect to us in writing.
 - In this case, we will no longer process your personal data unless we can demonstrate an overriding interest in processing or in bringing, pursuing, or defending legal claims. If you object to the processing, please indicate whether you also wish the data to be deleted, otherwise it will only be limited.
- f. **Right to lodge a complaint** - If you have a complaint, please let us know first so that we can try to remedy the situation. If we are unsuccessful, you can contact the National Authority for the Supervision of Personal Data Processing (ANSPDCP) through the procedure described on the Authority's website: <https://www.dataprotection.ro/>

Please bear in mind:

- **Timeframe:** We will try to resolve such requests within one month, which may be extended depending on the complexity of the request.
- **Lack of identification:** In some cases, we may not be able to search / find your data due to the identifiers you have indicated in your request. In such cases, where we cannot identify you as a data subject, we cannot comply with your request unless you provide us with additional information. We will inform you and give you the opportunity to provide such additional details.

- Please note that these rights are subject to conditions, exceptions or restrictions in accordance with applicable data protection legislation (e.g., to protect third parties or trade secrets). We will inform you accordingly, if applicable.

If you wish to exercise the above-mentioned rights please contact us in writing by completing the form available on the website: <https://www.parklake.ro/en/personal-data-protection-commitment/>, or by e-mail at dataprotection@parklake.ro.

VIII. TRANSFER OF PERSONAL DATA TO THIRD COUNTRY/INTERNATIONAL ORGANIZATION

The personal data collected by the Controller through the parking access management and LPR systems are not transferred to any third countries/international organizations.

IX. UPDATES TO THIS PRIVACY NOTICE

We may amend this notice at any time. The version made available (on our website or otherwise) is the current version.

Last update: 11.10.2022

Thank you for reading this document!