

GENERAL PRIVACY POLICY

Ensuring the privacy of individuals and the protection of personal data in the course of our business is a major concern for us. That is why we aim to offer a secure experience, both online and offline, respecting the right to privacy and the protection of personal data.

Under data privacy legislation, mainly European Regulation no. 2016/679 on the protection of individuals with regard to the processing of personal data and on the free movement of such data ("GDPR"), NEPI Rockcastle Group ("We", "Our", "Us" or "NEPI Rockcastle Group"), as a controller, has the obligation to handle personal data in accordance with the processing principles in a secure manner.

The present document is aimed at providing you with:

- an overview of our privacy practices and of the general principles governing the collection, processing, storage, disclosure, and disposal of personal data within NEPI Rockcastle Group: [DATA PROCESSING OVERVIEW](#)
- particular information regarding how NEPI Rockcastle plc, as controller, processes the personal data of any user accessing our presentation website: <https://nepirockcastle.com/> (the "Website") and getting in touch with us, by registering to the newsletter, or registering for any of the online events/webcasts that take place on the Website: [PROCESSING OF PERSONAL DATA PERFORMED THROUGH THE WEBSITE](#)
- a detailed presentation of the rights provided under the GDPR and of how you may exercise such rights: [YOUR RIGHTS](#)

A Data Protection Officer ("DPO") has been appointed at the NEPI Rockcastle 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 DPO may be contacted by the means of a written, dated, and signed application, using the following contact details: data.protection@nepirockcastle.com or mail us at Floreasca Business Park, Building A, 5th Floor, 169A Calea Floreasca, Bucharest 1, 014459, Romania.

This Privacy Policy was last updated on **March 24, 2021**.

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 when you visit the Website, because it may have changed since your last visit. If you have any questions about the information contained on this page, please contact us at data.protection@nepirockcastle.com.

1. DATA PROCESSING OVERVIEW

1.1. Principles of processing

Processing personal data with observance of GDPR and local data protection legislation is part of our core values.

We process personal data in accordance with the following principles:

- a) *Personal data are processed in a legal, fair and transparent manner* – this means that we should have a legitimate basis for which we are processing personal data, for example, consent obtained from you, or that the processing is necessary for compliance with a legal obligation to which we are subject. It also means that we should inform you about the processing in accessible and easy-to-understand communication.
- b) *Personal data are only collected for specified, explicit and legitimate purposes and are not processed in a manner that is incompatible with such purposes* – this means that we should always be able to provide a specific, explicit and legitimate purpose for which we collect personal data and not process the data further than for the purpose for which it was collected.
- c) *Personal data must be adequate, relevant and non-excessive in relation to the purpose for which they are collected and/or further processed* - this means that the personal data processed should always be limited to what is necessary in relation to the purpose. We will only process those personal data that are appropriate, relevant and strictly necessary for achieving the purposes for which we process personal data.
- d) *Personal data must be accurate and, if necessary, updated* – this means we take all reasonable measures to erase or correct without delay any inaccurate or incomplete data, having regard to the purposes for which such data was collected or for which it is further processed. We strive to process personal data that is accurate and, where appropriate, have implemented a data update procedure.
- e) *Personal data are not kept longer than necessary for the purposes for which they were collected or for which they are further processed* - this means we set appropriate retention periods for the personal data we process.
- f) *Personal data will be processed safely, ensuring a level of protection against illegal or unauthorized access, as well as loss, destruction, damage* – this means we strive to put the right security controls in place to protect against unauthorized and unlawful processing and accidental loss or destruction of, or damage to, personal data. This includes both technical and organizational measures such as defined processes, training and awareness.

The observance of the principles set out in points (a) to (f) above must be demonstrated, for which purpose the rules and requirements for the processing of personal data should be documented. For this purpose, NEPI Rockcastle Group has taken the necessary steps to prove the observance of these principles, in accordance with the accountability obligation provided under the GDPR. We ensure that we comply with all of these principles both in the processing activities NEPI Rockcastle Group currently carries out and as part of the introduction of new methods of processing, such as new IT systems.

1.2. Transparency

Every time we get personal data from you or we obtain your data from other entities, we'll let you know about issues related to:

- identity and contact details of operator and officer of personal data,

- the type of data,
- the purposes of processing,
- the basis of processing,
- the need for processing as a result of a legal provision/execution of a contract, and the consequences of your refusal,
- the categories of recipients to whom we submit your personal information,
- if we transmit these data to a third country,
- the duration for which we store these data and
- your rights in relation to the processing of personal data.

This information will be made available:

- in a dedicated privacy statement posted or otherwise made available at the place where the personal data are collected,
- in a centralized manner, in the privacy notice available on the websites dedicated to each of our assets (e.g., commercial centers, office buildings) – such privacy notice shall detail the data processing activities performed by the NEPI Rockcastle Group entity which owns the respective asset,
- if appropriate, through other means used by us to achieve this purpose (e.g., posters, symbols, etc.)

1.3. Access to personal data

Access to the personal data we process will only be provided to entities for whom we can justify a legitimate ground in accordance with the applicable law. Such entities include (i) companies part of the NEPI Rockcastle Group and (ii) individuals or entities with whom we collaborate in the course of our business (service providers).

We will require these entities and their staff to respect the confidentiality of these data, ensuring a high level of security for the data processing performed.

We will also provide personal data to judicial bodies, public institutions, or central and local public authorities, based on a duly substantiated request or legal obligation.

1.3.1. Entities within NEPI Rockcastle Group that may access personal data

The companies part of NEPI Rockcastle Group with which we may share personal data or which may provide to us personal data are:

Country	Company
Isle of Man	NEPI Rockcastle plc
Romania	AURORA MALL BUZAU SRL
Romania	BRAILA PROMENADA MALL SRL
Romania	CONSTANTA SHOPPING CITY SRL
Romania	DEVA SHOPPING CITY SRL
Romania	GALATI SHOPPING CITY SRL
Romania	IRIS TITAN SHOPPING CENTER SRL
Romania	MEGA MALL BUCURESTI SRL
Romania	NRE SIBIU SHOPPING CITY SRL
Romania	SIBIU SHOPPING CITY 2 SRL

Romania	PROMENADA MALL BUCURESTI SRL
Romania	RAMNICU VALCEA SHOPPING CITY SRL
Romania	RETAIL PARK PITESTI SRL
Romania	SATU MARE SHOPPING CITY SRL
Romania	SEVERIN SHOPPING CENTER SRL
Romania	SHOPPING CITY PIATRA NEAMT SRL
Romania	SHOPPING CITY TIMISOARA SRL
Romania	TARGU JIU DEVELOPMENT SRL
Romania	VULCAN VALUE CENTRE SRL
Romania	FESTIVAL SHOPPING CENTER SRL
Romania	NEPI TEN DEVELOPMENT SOLUTIONS SRL
Romania	BRASOV SHOPPING CITY SRL
Romania	TARGU MURES SHOPPING CITY SRL
Romania	Nepi Investment Management SRL
Bulgaria	SOFIA COMMERCIAL CENTER EOOD
Bulgaria	BULFELD EOOD
Bulgaria	NEPI PROJECT ONE EOOD
Bulgaria	CEE PROPERTY BULGARIA EOOD
Serbia	NEPI REAL ESTATE DEVELOPMENT D.O.O. BEOGRAD
Serbia	NEPI REAL ESTATE PROJECT ONE D.O.O. BEOGRAD-NOVI BEOGRAD
Serbia	NEPI REAL ESTATE PROJECT TWO D.O.O. BEOGRAD
Serbia	SEK D.O.O. BEOGRAD
Croatia	NEPI CROATIA MANAGEMENT D.O.O.
Croatia	ARENA CENTER ZAGREB D.O.O.
Czech Republic	Nepi Czech Management s.r.o.
Czech Republic	FORUM Usti s.r.o.
Czech Republic	Liberec Property s.r.o.
Lithuania	UAB Ozas Property
Lithuania	NEPI Rockcastle Lithuania
Poland	Rockcastle Poland sp. z o.o.
Poland	Gontar sp. z o.o.
Poland	Pogoria Property sp. z o.o.
Poland	Karolinka Property sp. z o.o.
Poland	Platan Property sp. z o.o.
Poland	Zielona Góra Property sp. z o.o.
Poland	Piotrków Property sp. z o.o.
Poland	Bonarka City Center sp. z o.o.
Poland	Olsztyn Property sp. z o.o.
Poland	Białystok Property sp. z o.o.
Poland	Milvus sp. z o.o.
Hungary	Mammut Zrt
Hungary	Tummam Kft
Hungary	Symmetry Arena Kft

Hungary	NEPI Rockcastle Hungary Kft
Slovakia	NEPI Slovakia Management s.r.o. (ex Žilina Shopping City sro)
Slovakia	AUPARK Košice, spol. s.r.o.
Slovakia	AUPARK Košice SC s.r.o.
Slovakia	AUPARK Tower Košice, s.r.o.
Slovakia	AUPARK Žilina SC a. s.
Slovakia	AUPARK Žilina, spol. s r.o.
Slovakia	AUPARK PIESTANY SC s. r. o.
Slovakia	AUPARK PIESTANY spol. s r.o.
Slovakia	SCP s.r.o.
Slovakia	Mlyny

Please check our up-to-date Group portfolio at <https://nepirockcastle.com/portfolio/>

1.3.2. Service providers

In the course of our business, we employ a wide range of service providers, such as:

- IT service providers (e.g., software maintenance and development, site maintenance and development, provider of IT tools and licenses);
- Marketing related service providers (e.g., 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);
- Business services providers (financial advisors, lawyers, accountants, auditors, tax advisors, etc.);
- Property management companies.

1.4. Transfer of personal data

We will do our best to ensure that all personal data processing activities we perform take place in countries part of the European Union or European Economic Area, or in jurisdictions concerning which the European Commission issued a decision regarding the adequate level of protection of personal data (e.g., Isle of Man).

However, there will be situations where personal data will need to be transferred to third party countries which are not part of the European Union, European Economic Area or for which the European Commission did not issue a decision regarding the adequate level of protection of personal data. Such transfer will be performed pursuant to implementing legally appropriate safeguards for the protection of personal data (e.g., based on standard data protection clauses in accordance with article 46 GDPR).

You can request details of those safeguards by contacting us at data.protection@nepirockcastle.com.

1.5. Security of personal data

We will take all necessary security measures to protect the personal data transmitted, stored or otherwise processed against destruction, loss, unlawful or accidental change, unauthorized disclosure or unauthorized access, as well as against any other unlawful processing.

The security measures we implement with regard to personal data can ensure the confidentiality, integrity, availability and continued resilience of processing systems and services, as well as the capacity to restore the availability of and access to personal data in a timely manner if a physical or technical incident occurs.

As provided by the GDPR, in case of personal data breaches, we will properly inform the relevant authorities and affected individuals.

2. PROCESSING OF PERSONAL DATA PERFORMED THROUGH THE WEBSITE

2.1. What personal data do we process?

Identity data: name and surname

Contact data: personal or business e-mail and phone number

Data regarding your professional status: company you work for/represent/collaborate with

Other data - data collected when you contact us or when you use our websites – e.g., IP address, geographical location, type and version of the browser, operation system, web accessing period and navigation ways.

Also, when you access the Website, we place cookies or other similar technical means on your device 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 the Website, at the "Cookies" section.

2.2. Why do we process your personal data and based on which legal basis?

Purpose for processing the personal data	Legal basis
Provide you with our NEPI Rockcastle Group Newsletter	Your consent, expressed when you registered for the newsletter
Contact you through the means of communication you provide to us (i.e. non-marketing information) and/or to provide you with support services when you request so	Performance of a contract concluded with you regarding the provision of our services
Allowing you to register for and participate in events and/or webcasts organized by us to provide information regarding the development of our business, including mandatory information which NEPI Rockcastle plc must provide considering the status of a listed company	Legal obligations incumbent to NEPI Rockcastle plc as a listed company to ensure transparency of financial information for current or potential investors Legitimate interest to ensure transparency, good communication with the public and attract new investors
Perform economic, financial and/or administrative management activities	Our legitimate interest to ensure efficient management of our business and comply with legal and statutory requirements applicable to us

Perform internal analyses (including statistical analyses and reports), to conduct market studies and analyses to improve and develop the services provided by NEPI Rockcastle Group and its business Partners	Our legitimate interest to continually develop and improve our business
Archive, settle disputes, investigations or any other petitions/complaints which involve us	Legal obligation
Perform risk checks on our procedures and processes and conduct audits or investigations	Our legitimate interest to ensure adequate risk management in all aspects of our business
Ensure a high level of security of our IT infrastructure (e.g. applications, network, website)	Our legitimate interest to ensure the safety of our IT infrastructure and comply with the security obligations incumbent to us, including under the data privacy legislation

2.3. With whom we share your personal data

We may share your personal data with:

- Third parties part of NEPI Rockcastle Group
- Third parties which act as our service providers – e.g., the provider who ensures emailing services, facilitating the delivery of our newsletters to your Inbox; the provider of the electronic solution, which enables us to facilitate the different features available on the Website
- Such providers are under the obligation to ensure the same level of diligence and security as us when it comes to the processing of your personal data
- Public or judicial authorities if we are legally obliged to do so. Sharing your personal data with such entities will be performed for the purposes mentioned under the section above.

As a result of the data transfers listed above, your personal data may be processed and stored in third-party countries (i.e., countries outside of the European Economic Area) for which the European Commission did not recognize an adequate level of protection of personal data, such as the United States of America. When this occurs, we will implement appropriate safeguards to ensure an adequate level of protection of the transferred personal data, such as concluding with the data recipient standard contractual clauses in the form approved by the European Commission for the transfer of personal data internationally.

2.4. How long do we store your personal data?

We store and further process your personal data for the above-mentioned purposes, in accordance with NEPI Rockcastle Group retention policies and applicable legislation. After the expiry of applicable retention periods, we either delete or anonymize your personal data.

In the case of the personal data processed for sending the NEPI Rockcastle Newsletter, we process your personal data until you withdraw your consent for processing, meaning that you no longer wish to receive our NEPI Rockcastle Group Newsletter. For such a case, kindly please contact us using the following contact details: data.protection@nepirockcastle.com or mail us at Floreasca Business Park, Building A, 5th Floor, 169A Calea Floreasca, Bucharest 1, 014459, Romania.

Your request will be processed in 24 hours since request.

For the avoidance of any doubt, the consent withdrawal shall not affect the legitimate processing performed before the date you withdraw your consent.

3. YOUR RIGHTS

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 of 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 based on 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 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 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 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 process your personal data. The complaint will be filed with the relevant national data protection authority – details at <https://ec.europa.eu/digital-single-market/en/news/list-personal-data-protection-competentauthorities>; in Romania, 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 an effect for the future, and processing before 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 concerning the 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 the relevant data protection authority, which you can exercise under the conditions established by the respective authority) 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.