

Policy regarding the protection of personal data

Central Ice Rink SRL

Central Ice Rink SRL welcomes you to its web page and thanks you for your interest in the company and its products and services.

We pay close attention to the protection of your personal data and we want you to feel safe while visiting our websites and in direct contact, through all means of communication made available by our company.

The protection of your privacy during the processing of personal data is an important aspect for us, which we take into account during the course of our operational processes. The personal data of the visitors of our web pages and those collected physically or on other online channels from our clients and potential clients are recorded and processed safely and in accordance with the legal provisions regarding data protection valid in Romania and detailed by the General Data Protection Regulation.

The identification data of **Central Ice Rink SRL** is the following: sole registration code RO32773446, Trade Registry No.: J40/1577/2014, headquarters: 24-26 Nordului Road, room 7, 1st floor, 1st District, Bucharest.

Central Ice Rink SRL is part of Tiriac Group and may carry on business relationships with the other companies part of the group, without being limited to these companies. This does not involve the transfer of your personal data to other companies of Tiriac Group.

Central Ice Rink SRL may transfer personal data to the companies with which it operates for the purpose of carrying out the contracts and based on its legitimate interest and to the ITH Management Office, in its capacity as joint controller.

Data processing means operations such as: collection, recording, organizing, storing, modifying, extracting, consulting, using, transferring, combining, restricting, deletion, destroying, archiving of personal data, etc.

In the continuation of this Policy regarding the processing of personal data, reference will be made to "Client".

By using the term "Client" **Central Ice Rink SRL** understands any representative of the general public, with whom the company comes into contact and does not represent a limitation on the person who purchased a product / service or with whom a contract is in progress.

Means whereby Central Ice Rink SRL obtains the data

The data is obtained directly from the Client and/or from a Client's authorized person (when filling in forms or documents, accessing the web page, online applications, or by any other means of communication).

In addition, **Central Ice Rink SRL** can obtain the above data by consulting external sources. By external sources we mean public institutions and authorities, public registers and guidelines, information that you have made available to the public through social media, as well as on the Internet.

At the same time, the data can also be obtained from our joint controllers or from the controllers for whom act in capacity of processors.

The client can make available personal data by filling-in forms from the website, by contract, by fiscal invoices issued to him/her, by participating in various marketing actions of the company, in which he/she has filled in forms, etc.

Sign up for the newsletter

On our website, the public may have the opportunity to subscribe to various newsletters, the data offered for subscription will be used exclusively for marketing purposes, unless you have consented to other uses of the data. You can stop the subscription to the newsletter at any time, using the possibility to unsubscribe from the newsletter or by communicating a written request to the address dataprotection@tiriacgroup.ro.

Legal basis for personal data processing by Central Ice Rink SRL.

Central Ice Rink SRL processes personal data based on the following legal basis:

for the execution of a contract to which the Client or the data subject is a party (e.g.: sale-purchase of products, providing support services for the purchased products, sending notifications/information about the purchased service).

- based on the legitimate interest of **Central Ice Rink SRL** (for example: surveys in order to develop and improve products and services, optimizing processes, centralizing operations and maintaining an internal database, statistical analysis on the Client portfolio, analyzing and minimizing financial, reputational risks to which the company is exposed in connection with the provision of services and products, providing answers to the requests of clients or the public);
 - based on the Client's consent, if it has been granted (e.g. in the case of marketing);
 - based on the interest of the data subject (e.g. information about the services purchased).

The purposes for which **Central Ice Rink SRL** processes personal data are:

- the supply of products and services, through all the channels available for this purpose (e.g.: the physical location of the Ice Skating Rink - Telekom Arena, internet, telephone, etc.);
- identification of the data subjects both in the physical locations related to the company, as well as through the means of communication (e.g. telephone, e-mail, post, internet);
- centralizing the operations and maintaining an internal database, where the data regarding the data subjects is stored, so that it can be used by the departments and structures of **Central Ice Rink SRL** in their activity (e.g. the use of this data implies its processing by the internal applications of **Central Ice Rink SRL**, which are used by the relevant departments within their activity);

- contacting the Client/other data subject through the means of communication in order to inform/notify information about contracted products and services of **Central Ice Rink SRL** (e.g. term expiration, modification/completion of features/costs/functionalities/benefits of services);
- providing support services for the requests of the Client/data subject (e.g.: additional information about the products, updating some of the identification data, conducting investigations regarding malfunctions of the products and/or services offered, solving the requests, complaints and petitions drafted), both in the physical locations of **Central Ice Rink SRL**, as well as through the means of communication (e.g. telephone, e-mail, post);
- creating or analyzing profiles in order to improve products/services, to perform any other types of product/service promotion, or to carry out direct marketing activities through any means of communication (e.g. mail, telephone, fax, e-mail, SMS of advertisements addressed directly and specifically to a certain person) if the Client has accepted it through any request or form of the company, based on consent.
- carrying out general marketing or advertising activities, customer loyalty activities based on consent and conducting surveys (online, postal or telephone).
- identification of the situations where the users of social networks are clients of the company in order to carry out personalized marketing, according to the Client's option expressed through forms of/issued by the company.
- analyzing the behavior of the Client/any person who accesses the website, by using cookies, both of the company and of third parties, with the purpose to provide general or customized content, offers tailored to the interests of the users - for detailed information on the Cookies Policy please consult our web page;
- for loyalty programs consisting of offering advantages, rebates, discounts to reward customer loyalty.
- conducting internal analyzes (including statistical analyzes), both on products/services and on the client portfolio, for the improvement and development of products/services, as well as carrying out market studies and analyzes on company products/services for the improvement and development of products/services;
- archiving of documents both in physical and electronic format, performance of registration services of correspondence addressed to the company and sent by the company, as well as carrying out courier activities;
- resolving disputes, investigations or any other petitions/complaints/requests to which the company is a party;
- performing risk controls on the company's procedures and processes, as well as carrying out audits or investigations of the company;
- making reports to the competent institutions according to the applicable legal regulations;
- for the video recording of the presence of the individuals in the physical locations of the company, in order to maintain a high level of security.
- for a number of secondary purposes (e.g. for archiving, internal audit, external audit, etc.), these being always compatible with the main purposes, for which the data was initially collected by the company.

Profiling and automatic decisions at the level of Central Ice Rink SRL.

In order to provide services and products, the company can create various profiles regarding its Clients. These profiles do not imply exclusively automatic decision making. Such profiles are used in order to segment the Client portfolio for the development of products and services, as well as to ensure the personalized promotion of the company's products, and to ensure the direct marketing activities taking into account the products owned by the Clients, their transaction history and preferences resulted from the use of our products and services.

The recording of telephone calls made by Central Ice Rink SRL.

With the agreement of the Client/data subject expressed before each telephone call, the company can record and keep the telephone calls towards/from the telephone exchanges of the company. The Company will use this information exclusively for the purpose of improving its services, investigating certain situations, to prove certain consents given by the Client, or to use them as evidence in court in the event of a dispute.

Video monitoring performed by Central Ice Rink SRL.

In order to ensure a high level of security corresponding to the operational activity, the physical locations of the company are being video monitored. In these locations there are corresponding markings with specific symbols for the video recording, followed by the message "Area under video surveillance".

The period of time during which Central Ice Rink SRL processes personal data.

In order to achieve the aforementioned purposes, the personal data will be processed by the company throughout the contractual relationship and after its termination in order to comply with the legal obligations applicable in the field, including, but not limited to, the archiving provisions.

The processing of the data that is based on the Client's consent (e.g. in the case of direct marketing and/or promotion of services and products, subscription to electronic newsletter) will be processed by the company without a limitation of period, with the possibility for the Client to withdraw the consent at any time, which in addition will be brought to the attention of the Client at a frequency of up to 5 (five) years.

The term for archiving the data processed by **Central Ice Rink SRL** is: 10 years.

The statutes of limitation for the data processed by **Central Ice Rink SRL** is: 10 years.

The term of data processing in order to solve the legal problems at **Central Ice Rink SRL** level is: 10 years.

Recipients of personal data transferred by Central Ice Rink SRL.

The recipients of the data can be:

- joint controllers:
- the Company ITH Management Office –provider of consultancy of Central Ice Rink SRL.
- processors:

Service providers: IT services (maintenance, software development), physical and/or electronic archiving; courier; utilities; audit; support services; providers of market research, transmission of marketing

communications, traffic monitoring and user behavior, online tools, personalization services of different types of marketing, marketing services through social media resources, development services for content marketing forms; debt recovery services and/or debt collection, appraisers, media agencies.

- authorities and institutions:

- Judicial bodies in Romania and other countries, such as the members of the courts of law, the arbitration courts, the prosecutor's offices.
- Investigation and support institutions for cyber security incidents.

In order to fulfill the aforementioned purposes, it is possible that Central Ice Rink SRL may transfer some or all categories of personal data outside Romania or the EU/EEA countries. The EEA is made up of the countries of the European Union, Switzerland, Iceland, Liechtenstein and Norway. This type of data transfer can take place if our servers (respectively the place where we store the data) or our suppliers and providers are located outside the EEA.

Before transferring personal data from the European Economic Area (EEA) we will ensure that there are adequate safeguards to be used, including the signing of a Data Transfer Agreement, in accordance with the requirements of the European Union and, if necessary, we will obtain authorization of the Competent Authority for Data Protection. The entity that receives the personal data must comply with the principles of the processing of the personal data provided in the Procedure for Cross-Border Data Transfer.

The rights of the Client / data subject and the ways of exercising them.

- 1. The right of access to personal data** - means the right of the Client to have access to the data in the filled-in form.

If the Client considers that this Policy for the processing of personal data is not sufficiently clarifying, he/she may have access to information by sending a request to the address dataprotection@tiriacgroup.ro wherefrom you can find:

- what is the purpose of processing personal data?
- what categories of personal data are concerned?
- who are the recipients to whom the personal data were provided?
- which is the period for which the personal data will be stored?

- 2. The right to rectify data** – if the Client notices that the personal data is inaccurate or incomplete, he/she has the right to request the rectification or completion of this data by sending a request to the address: dataprotection@tiriacgroup.ro.

If the personal data is not entered by the Client, as a data subject, he/she has the right to request any available information regarding its origin, and this will be provided to the extent available and only if the author who provided the data can be identified. For this, we will have to be provided with data about the Client to demonstrate that the provision of the data was not done through his/her direct action.

Separately, the Client can request to know if the data is processed or not, and if affirmative, he/she can request access to it, as well as certain information about it. Upon Client's request, he/she may also receive a copy of the filled in form or other format that the company owns.

The Client must be aware that any rectification may be made within a period of at least one month, but, under special conditions, this period may be extended up to two months, in which case the Client will be informed of the extension.

Also, if we do not respond to the Client's request for rectification or we will not answer, but also if we do not reach an agreement regarding the rectification term, the Client has the right to file a complaint with the National Supervisory Authority for Personal Data Processing and to file an appeal in court.

3. The right to data deletion or “The right to be forgotten” - is the Client's right to obtain from our company the deletion of personal data from the website, without undue delay, and we, as controllers, have the obligation to respond to the request if one of the following reasons exists:

- the data is no longer needed for the purposes for which it was collected or processed;
- the Client withdraws his/her consent on the basis of which the processing takes place;
- when the Client opposes the processing of his/her data;
- when there are uncertainties related to the legality of the processing of personal data;
- if there appears is a legal obligation that we will comply with in our capacity as controller;
- if personal data belongs to children under the age of 16, and the parents or persons exercising parental rights withdraw their given consent.

In our turn, depending on the technology available and the cost of implementation, we will take reasonable measures, including technical measures, in order to inform all processors who had access to personal data regarding the fact that the Client requested its deletion, including copies or links referring to the respective data.

The situations in which we do NOT have the obligation to respond to the Client's request to delete personal data are:

- the exercise of the right to free expression and information;
- compliance with a legal obligation;
- reasons of public interest, in the field of public health;
- archiving purposes for public interest, scientific or historical research or for statistical purposes;
- ascertaining, exercising or defending a right in court.

4. The right to restrict access to personal data – means one of the following situations:

- Rectification of incorrect or inaccurate data, the Client may request to restrict access to the data during the period necessary for data verification and rectification;
- if the Client finds that the processing is illegal, but he/she does not want to have the personal data deleted, instead requesting the restriction of its use;
- if our company no longer needs the personal data or the storage period has expired, but the Client wishes to keep the data in order for use it for an action in court;

- if the Client is against processing, then, he/she may request the restriction of access to his/her personal data as long as we verify that our legitimate rights as controllers prevail over the right of the Client to oppose the processing. Also, if there is a situation of lifting the restriction on processing, the Client will be informed in due time.
5. **The right to withdraw the consent** - for data processing, only if the Client's data is processed as a result of the express consent, then he/she has the possibility at any time to send an e-mail to dataprotection@tiriacgroup.ro, whereby to notify that he/she no longer agrees with the processing of personal data. Withdrawal of the agreement/consent for the processing of his/her personal data has the effect of ceasing the communications and processing, as well as the cooperation. The withdrawal of the consent does not affect the legality of the processing carried out on the basis of the consent before its withdrawal.
 6. **The right to data portability** – is the possibility that the Client has to receive the data provided in the format used by us, but that can be read automatically. Also, the Client has the possibility to ask us to have this data submitted - to have it transferred - automatically to another controller (legal entity), as he/she will designate to us.
 7. **The right to oppose the processing** – applies only to particular situations or cases in which the Client may find himself/herself; it is the Client's right to ask us not to process his/her data for the purpose of creating profiles. Exception from this rule is the situation when there are legitimate reasons prevailing over the Client's right to oppose, such as: ascertaining, exercising or defending a right in court, of the Client or that of another user.

All the aforementioned rights are exercised by sending a written, dated and signed request to the headquarters of the company at 24-26 Nordului Road, 1st district, Bucharest, or at the e-mail address: dataprotection@tiriacgroup.ro with reference to "GDPR request", except for the right to address the National Supervisory Authority for Personal Data Processing and to justice (by exercising a single remedy), which is exercised by written request to the competent authority.