

INFORMATION NOTE
on the processing of personal data
Event

"15 Years of Excellence in Movement – Plus Autotrade"

PLUS AUTOTRADE S.R.L., with registered office in Șoseaua Nordului, nr.96 G, et.1, ap.3, Sector 1, Bucharest, registered with the Trade Register under no. J40/1392/2010, having unique registration code RO 26504133 ("**PLUS AUTOTRADE**") as an operator ("**Operator**"), we hereby provide you with **the relevant information on how we process personal data in the context of participation in the Event "15 Years of Excellence in Movement – Plus Autotrade" organized by us on February 20, 2025** (the "**Event**"), in accordance with the provisions of Article 13 and Article 14 of the General Data Protection Regulation ("**GDPR**").

The Controller has decided to designate a contact point, so that, for any information or requests regarding the processing of personal data in the context of participation in the Event or for the exercise of rights as a data subject regarding the processing of personal data, you can contact **the Data Protection Officer of PLUS AUTOTRADE**, using the following coordinates:

- Address: Șoseaua Nordului, nr.96 G, et.1, ap.3, Sector 1, Bucharest
- Email Address: gdpr@plus-auto.ro
- Tel. 0040740223382

Please read this information carefully, as it contains important information for you!

The information note details when, how and why we, as the Controller, process personal data, how we use them, how we store them, what are the rights as a data subject and how they can be exercised.

I. PERSONAL DATA PROCESSED, PURPOSES AND LEGAL BASES

Your decision to participate in the Event implies acceptance of the conditions of organization, both for you and for your children, and parental authorization is presumed in this case.

Personal data is processed by the Controller, as follows:

- 1. In order to promote the Event , we will jointly take ambient, wide-frame photographs that will capture the general atmosphere of the Event, without the purpose of identifying people. As a rule, we will not aim to take photos that lead to the identification of the participants.**

However, it is possible that some photos still capture the image of the participants. As a result, the processing is carried out on the basis of your consent manifested by participating in the Event, both for you and for your child(ren).

In the case of close-up images (portrait-type photos, or those that have people in the foreground), you can manifest your option to be photographed or not, directly towards the photographers of the Event (even verbally or through your own conduct in front of the camera). If you do not wish to appear in these close-up/portrait frames, please express your refusal to the photographers.

From the photos that will be taken on the occasion of the Event, PLUS AUTOTRADE will independently decide if and to what extent they will select some of the photos that will be published

on their website and/or on social networks and whether they will organize an archive for the others or delete them from their own records.

II. DATA RECIPIENTS

Personal data may be disclosed, strictly to the extent necessary for the purpose detailed above or in cases where this is required by law, to the following categories of recipients who may have the status of independent controllers, joint controllers or processors, as follows:

a) Service providers:

- photo services;
- archiving services;
- services regarding the data protection officer;
- social media platforms, as applicable, such as Facebook, LinkedIn, Instagram, YouTube (in these cases, please refer to their available data processing policies as follows:
 - o <https://www.facebook.com/privacy/explanation>
 - o <https://www.linkedin.com/legal/privacy-policy>
 - o <https://help.instagram.com/519522125107875>
 - o <https://policies.google.com/privacy?hl=en>
 - o <https://www.tiktok.com/legal/page/eea/privacy-policy/en>

The disclosure of personal data to the Controller's service providers acting as processors of the controller is limited to the information strictly necessary for the provision of those services, these providers having the contractually established obligation not to use the personal data processed on behalf of the Controller for any other purpose.

III. TRANSFERS TO THIRD COUNTRIES AND INTERNATIONAL ORGANISATIONS

PLUS AUTOTRADE will independently decide whether and to what extent they will transfer personal data and under what conditions these transfers will be made.

As a rule, **PLUS AUTOTRADE** will not transfer personal data outside the European Economic Area, i.e. to countries that are not agreed as ensuring an adequate level of data protection. In exceptional situations and only if necessary, the transfer of personal data outside the area described above will be made only with the application of adequate safeguards and protection measures (i.e. adequacy decisions of the European Commission) in accordance with the specific legal provisions on personal data protection and with appropriate information.

IV. RIGHTS REGARDING PERSONAL DATA

Unless otherwise required by Romanian law or the GDPR, you have the following rights:

- 1. The right to be informed**, in accordance with Art. 13 and Art. 14 of the GDPR, as is the case in this document.
- 2. Right of access**, according to Art. 15 of the GDPR.
- 3. The right to rectification** according to Art. 16 of the GDPR.
- 4. The right to erasure of data/right to be forgotten** according to Art. 17 of the GDPR.
- 5. The right to restriction of processing** in accordance with Art. 18 GDPR.

6. **The right to data portability**, according to Art. 20 of the GDPR.
7. **The right to object** in accordance with Art. 21 of the GDPR.

When you send us a request to exercise this right, please also mention the reasons related to the particular situation in which you or the child whose parent/legal guardian you are. We will no longer process personal data unless we demonstrate (i) that we have compelling legitimate grounds for the processing that override your interests, rights and freedoms or those of your parent/legal guardian or that (ii) the purpose of the processing is to establish, exercise or defend legal claims.

8. **The right not to be subject to a decision based solely on automated processing, including profiling**, in accordance with Art. 22 of the GDPR.

The personal data referred to in this Privacy Notice are not subject to automated decision-making processes.

Please note that these rights are not absolute, which means that there are certain exceptions to their exercise. These rights are applicable on a case-by-case basis.

9. **The right to withdraw your consent**, according to art. 13 para. (2) letter c) and art. 14 para. (2) lit. d) of the GDPR.

This right applies if personal data is processed as a result of the consent expressed, in which case you have the possibility at any time to submit a request for withdrawal of consent using the contact details available above.

The withdrawal of consent does not affect the lawfulness of the processing carried out on the basis of consent before its withdrawal. The withdrawal of consent to the processing of personal data has the effect of ceasing the processing.

10. **The right to lodge a complaint with the supervisory authority**, according to art. 13 para. (2) letter d) and art. 14 para. (2) letter e) of the GDPR.

Without affecting your right to contact ANSPDCP at any time, please contact us in advance, in connection with the exercise of the aforementioned rights.

If you consider that we have not resolved all your requests or you are not satisfied with our answers, you can contact ANSPDCP to file a complaint using the following contact details:

- headquarters: Bucharest, Bdul Gen. Gheorghe Magheru nr. 28-30, sector 1, CP 010336
- Phone: +40.318.05.92.11
- Fax: +40.318.05.96.02
- E-mail: anspdcp@dataprotection.ro
- Website: www.dataprotection.ro

or you can lodge a complaint with the competent court.

Please take into account the following aspects related to the exercise of your rights or those of the child whose parent/legal representative you are, as a data subject:

- **How to exercise:** you can contact the Data Protection Officer of **PLUS AUTOTRADE**, as a single point of contact, by using the contact details available above.
- **Response time:** We will try to resolve your request within one month, which may be extended by two months for specific reasons related to the complexity of the request. In all cases, if this period is extended, we will inform you of the duration of the extension and the reasons that led to it.
- **Identification:** Please provide us with the data necessary to identify you or the child whose parent/legal guardian you are (name, surname, email address), with the mention that, to the extent that we cannot identify you or the child whose parent/legal guardian you are based on this information alone, we will ask you to provide us with additional information that allows identification.

V. STORAGE OF PERSONAL DATA

PLUS AUTOTRADE will independently decide the storage period of personal data according to their internal policies.

The photos will be kept on **PLUS AUTOTRADE**'s social media pages for 5 years, or until the moment of withdrawal of consent whichever is earlier. You have the right to request their deletion at any time. Subsequently, we will remove/delete the personal data from our systems and records and/or take steps to anonymize it so that you or the child whose parent/legal guardian you are can no longer be identified. We will take all reasonable steps to ensure the erasure of personal data transmitted to recipients for the aforementioned purposes.