

**BB IMO S.R.L.** with headquarters in the city of Arad, splaiul General David Praporgescu, no. 17, ap. 1, Arad county ("us") undertakes to respect your confidentiality. This Privacy Policy describes how we use, distribute, protect and process as Data Providers the Personal Data (as defined below) that we may collect in connection with you during use by of your site.

This Privacy Policy has been drafted in light of the General Data Protection Regulation ("**GDPR**"). We are committed to follow the GDPR in all data processing operations in the European Economic Area and where it otherwise applies.

The Site is not intended for children and we do not knowingly collect data relating to children.

We may provide supplemental privacy notices on specific occasions when we are collecting or processing Personal Data about you. Those supplemental notices should be read together with this Privacy Policy.

### **What Personal Data We May Collect**

"**Personal Data**" refers to any information that may be used, alone or in combination with other information, to identify you. We may collect Personal Data relating to you as follows:

- If you use the Site in order to request information you may provide your name, surname, address, telephone number, e-mail address.
- If you leave a comment on one of our social media platforms (for example, a question about our products on our Facebook page), we may collect that comment, including any Personal Data contained in that comment (e.g. , surname, name, phone number, e-mail address, other personal data you can provide in this process).
- The site can also automatically collect information about your browser or mobile device. We may use cookies, web beacons and similar technologies to help us understand your activity on the Site. The data we automatically collect includes the type of web browser or mobile device, your operating system, your IP address, the landing page URL and the referral website, the time and date of using the Sites and the search terms Use yours to reach Sites. For more information about cookies and related technologies we use on Sites, please see our Cookies Policy.

We also collect, use and share aggregated data such as statistical or demographic data for various purposes. "Aggregated data" refers to information that could be derived from your Personal Data but that will not directly or indirectly reveal your identity, e.g., aggregated data relating to all of our website visitors.

### **How We Use Your Personal Data**

To the extent permitted by law, we use your Personal Data for the following purposes and based on the following legal grounds:

### Contractual necessity

We may process your Personal Data where it is necessary to enter into a contract with you for the provision of our products or services or to perform our obligations under that contract. For example, we may need to process your Personal Data to:

- provide you with the products and services that you have requested on our Sites, over the phone, via third-party retailers, including processing orders, taking payments, providing catalogues;
- manage and maintain our relationship with you, including responding to a question or comment made by you and providing you with other customer support;
- for a promise sale agreement;
- exercise and protect our rights under the contract with you.

If you do not provide us with certain Personal Data for processing as described above, we may not be able to provide the service or product requested.

### Legal obligation

We may be required by law to collect and process certain Personal Data about you. For example, we may need to process your Personal Data to:

- make a contract/agreement with you

If you do not provide us with certain Personal Data for processing as described above, we may not be able to provide the service or product requested.

### Our legitimate interests

We may process your Personal Data where it is necessary for our legitimate interests as a company, including to manage, promote and improve our business and manage our risk. For example, we may process your Personal Data to:

- carry out analytics and market research to enable us to improve the Site and our products and services, e.g., by contacting you to receive feedback on the quality of our service made for you;
- communicate to you important notices, such as information about changes to the Site and service/buildings/apartments updates;
- inform you of our new products, services and special offers that we think you will find valuable by sending promotional messages, including newsletters, via

email, SMS, phone, and/or other similar electronic communications means, unless your consent is required for such communications (see below). If you would prefer not to receive these communications, simply follow the unsubscribe instructions on the promotional communications that you receive or contact us as described below;

- prevent and detect unlawful behavior, and protect or enforce our legal rights, for example defending the company in case of legal disputes; and
- keep records of the activities carried out.

### Your consent

We may also seek, either directly or through our trusted third parties, your separate consent to process your Personal Data, for example, when you choose to receive direct marketing messages from us.

If we have sought your consent to process your Personal Data, you may subsequently withdraw it at any time by contacting us at the address listed below in the “How to Contact Us” section without affecting the lawfulness of processing based on consent before its withdrawal.

If you provide us with Personal Data of third parties (such as the situation when you make a complaint regarding the product of a family member), you must ensure that you notify the relevant third party before sharing their Personal Data with us by showing them this Privacy Policy, explaining that their Personal Data will be processed in accordance with this Privacy Policy, and obtaining their consent, where appropriate.

### **Sharing of Your Personal Data with Third Parties**

In principle, we do not share with or disclose your Personal Data to third parties. However, we may disclose your Personal Data to third parties in the following cases:

- Service providers. We may disclose your Personal Data to companies that provide services to us, that act as data processors, such as companies that operate for us or vendors that deliver orders to you, marketing, courier, payment / banking services, telemarketing or other services. The service providers are required to keep your Personal Data confidential and are not permitted to use your Personal Data for any other purpose than to carry out the services they are performing for us.
- Third parties where required by law. We may disclose your Personal Data to a third party if it is necessary to comply with a legal obligation or the decision of a judicial authority, a public authority or a government body, or if disclosure is necessary for national security, law enforcement or other issues of public importance.

- Business partners. We may disclose your Personal Data to our business partners if it is necessary for providing products and services to you, such as after-sales services or repair services to the products and services that you have purchased from us.
- Third parties in connection with a business sale. If we make a sale or transfer of assets, or are otherwise involved in a merger or business / asset transfer, we may transfer your Personal Data to one or more third parties as part of that transaction.
- Other third parties with your consent. We may also share your Personal Data with other third parties when you consent to such sharing.

### **International Transfers of Your Personal Data**

We do not distribute your Personal Data outside the European Economic Area ("EEA") to countries that have Personal Data Protection laws other than your country of residence if there is any future collaboration with a partner outside the EEA before transferring your Personal Data outside the EEA, we will take steps to ensure that the data will benefit from the same level of protection as the applicable EEA data protection laws. For data transfers outside the EEA, we will use, if applicable, the applicable warranties, including the standard contractual clauses adopted by the European Commission, and will provide you with a copy upon request.

### **Retention of Your Personal Data**

Your Personal Data will be retained only for so long as reasonably necessary for the purposes set out above, in accordance with applicable laws, including for the purposes of satisfying any legal, regulatory, accounting or reporting requirements.

### **Security Measures Taken for Your Personal Data**

We will take reasonable precautions to protect your Personal Data against loss, misuse or alteration. Among other measures, we ensure the security of your Personal Data by means of encryption and by otherwise restricting the access to your Personal Data.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your Personal Data as required by law, we cannot guarantee the security of your Personal Data transmitted to us using unsecured means; any transmission is at your own risk.

### **Your Rights for Your Personal Data**

You have the following rights with respect to your Personal Data that we process, subject to conditions set out in the applicable laws:

- to learn whether your Personal Data is processed by us and to request a copy of your Personal Data and information relating to the processing of your Personal Data, including the purposes of processing your Personal Data, the third-parties to whom your Personal Data is disclosed;
- to request the correction of any inaccurate or incomplete Personal Data;
- to request the erasure of your Personal Data or the restriction of the processing of your Personal Data, specifically, you have the right to obtain the restriction of processing in cases where: (i) you consider that the processed personal data are inaccurate, for a period enabling the controller to verify the accuracy of the personal data; (ii) the processing is unlawful, however you don't want us to erase your personal data, but to restrict the use of data; (iii) in case the data controller no longer needs your personal data for the above-mentioned purposes, but you are requiring the data for establishing, exercising or defending a legal claim or (iv) you have objected to processing pending the verification whether the legitimate grounds of the data controller override those of the data subject;
- to object to our processing of your Personal Data;
- to withdraw any consent you have given;
- under certain circumstances to demand data portability;
- to lodge a complaint with the applicable data protection supervisory authority; and
- to contest certain automated decisions we make about you that have legal or otherwise similarly-significant consequences. We do not typically carry out such automated decision-making but, if we will do, we will make it clear where such decisions are being made.

To exercise your rights, please contact us using the contact details listed in the section below on *How to Contact Us*.

### **Third-Party Websites and Content**

Third parties, whose sites you may visit after clicking on a link from [our site] [the Sites], may have less stringent privacy policies. We do not have control over these policies and urge you to read their privacy statements before providing any personally identifiable information to such sites.

### **How to Contact Us**

If you would like to know more about our processing operations and our commitment to this Privacy Policy, you can contact our Data Protection Officer at [info@bb-imo.ro](mailto:info@bb-imo.ro). You can also write to us at: BB IMO S.R.L., Romania, Arad County, Arad, General David Praporgescu Street, no. 17, ap. 1.

## **Changes to this Privacy Policy**

We may change and update this Privacy Policy from time to time. Any changes to our Privacy Policy will be posted on this page. We will notify you of any *significant* material changes or additions to this Privacy Policy and will provide you with a copy of the amended Privacy Policy by use of your email address provided to us, or by any other suitable means which ensures that you will be notified of any changes to this Privacy Policy.

This Privacy Policy was last updated on 05.06.2019.