

Privacy Policy

When you visit the TRACON SRL websites, when you contact us for a quote or when you call for our services, you entrust us with your information. The purpose of this Privacy Policy is to show you what data we process, why we process it and what we do with it. Being fully aware that your personal information belongs to you, we do our best to store it safely.

By using any of our products or services and/or by agreeing to this Statement, e.g. in the context of registering for any of our products or services, you understand and acknowledge that we will collect and use personal information as described in this Statement UE 2016/679 (GDPR).

TRACON SRL operates the following websites: www.tracon.ro; www.marinaregia.com; spa.marinaregia.com; www.hanulpiratilor.com and www.casapopeea.com.

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Personal information we collect

We collect personal information at every touch point or guest interaction, and in conducting every aspect of our business, we may collect personal information. This personal information may include: your name and surname, mailing address, billing address, email address, phone number, information related to your reservation, family component (adults and children), stay or visit to a property; participation in a contest, sweepstakes, or marketing program (even if you do not stay at one of our hotels); information related to the purchase and receipt of products or services; personal characteristics, nationality, income, passport number and date and place of issue; personal numeric code; travel history; payment information, such as your payment card number and other card information, as well as other billing details; guest preferences; marketing and communication preferences; information about vehicles you may bring onto our properties; reviews and opinions about our Portfolio properties; and other types of information that you choose to provide to us or that we may obtain about you.

We may ask for details on joint travellers, including their identification data. We may also collect information related to conversations through social media networks or SMS.

In addition, we collect other personal information in certain cases, such as:

- *Surveys:* We may request demographic data or other personal information in customer surveys.
- *On-property Collection:* We collect additional personal information during registration/check-in at our properties, including such information as may be required by local laws. We may also use record sound or video for the protection of our staff, guests and visitors to our properties where permitted by law. In addition, we may collect personal information in connection with on-property services, such as concierge services, health clubs, spa, activities, leisure services, and equipment rental.
- *Event Profiles:* If you plan an event with us, we collect meeting and event specifications, the date of the event, number of guests, details of the guest rooms, and, for corporate events, information on your organization (name, annual budget, and number of sponsored events per year). We also collect information about the guests that are a part of your group or event. If you visit us as part of a group, we may have personal information about you provided to us by the group and may market to you as a result of your stay with a group or attendance at an event in accordance with your preferences as permitted by law. If you visit us as part of an event, we may share personal information about you with the event planners, as permitted by law. If you are an event planner we may also share information about your event with third-party service providers who may market event services to you as permitted by law.
- *Social Media:* If you choose to participate in TRACON SRL-sponsored social media activities or offerings, we may collect certain information from your social media account consistent with your settings within the social media service, such as location, check-ins, activities, interests, photos, status updates and friend list. We may also allow you to enter into contests to provide photos, such as of your stay with us, which you may share with your connections on social media for votes, shared offers or other promotions.
- *Forward-to-a-Friend:* From time to time, we may offer a feature that allows you to share a message with a friend, whether via the Internet. By using this feature, you represent that

you are entitled to use and provide us with the recipient's name and email address for this purpose.

Personal information we collect from third parties

We may also collect information about you from third parties, from your social media services consistent with your settings on such services; and from other third-party sources that are lawfully entitled to share your data with us.

Use of personal information collected about you

We use your personal information in a number of ways, including to provide and personalize the services you request and expect from TRACON SRL, to offer you the expected level of hospitality in-room and throughout our properties, conduct direct marketing and sales promotions and as set forth below in more detail. We will collect your consent prior to processing your data where required by applicable law.

We are obligated to collect certain data, including your name and surname, address, payment information, in order to process your reservation. Failure to provide this information will result in our inability to process your reservation.

- *Meeting and Event Planning:* We may use your personal information to provide you with information about meeting and event planning.
- *To answer questions and requests*
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- *Marketing and Communications:* Where permitted we may use your personal information to provide or offer you newsletters, promotions and featured specials, as well as other marketing messages in accordance with any communications preferences you have expressed. We use your information to provide in-stay messaging and reservation confirmations; to send you marketing messages; and to conduct surveys, sweepstakes, prize draws, and other contests. We may provide these communications via email, postal mail, online advertising, social media, telephone, text message (including SMS and MMS), push notifications, in-app messaging, and other means. With your consent, we also use user-generated content (such as photos) from social media services to deliver display advertising or on our website and apps. We use personal data to send you marketing messages based on your expressed consent. You can withdraw your consent for direct marketing communications at any time, by contacting us at dataprotection@tracon.ro following the unsubscribe instructions in your marketing message.
- *Service Improvements:* We may use your personal information to improve TRACON SRL services and to ensure that our site, products, and services are of interest to you.
- *System Registration and Service Invoicing:* We will use your personal data to register you in our management systems and to compile your invoices in accordance with current legislation.
- *Data Correctness, Analytics and Personalization:* We may aggregate your personal information with data from third-party sources for purposes of keeping information up to

date and analytics. We also rely on information from third parties in order to provide better, more personalized service. For example, if you connect your social media services or other accounts to our services, we may use this information to make your experiences with us more personal and social, or share and use it as described elsewhere in this Statement.

Personal information we share

In order to offer you the expected level of hospitality and to provide you with the best level of service, we may share your personal information to our service providers and other third parties as set forth in detail below:

- *Group Events or Meetings:* If you visit TRACON SRL as part of a group event or meeting, information collected for meeting and event planning may be shared with the organizers of those meetings and events, and, where appropriate, guests who organize or participate in the meeting or event.
- *Collaborators:* We may partner with other companies to provide you with products or services and may share your information with our business partners accordingly. For example, we may help to arrange rental cars or other services from our business partners (transfers, equipment rental, floral rentals, restaurant and club reservations, various services) and share personal information with our business partners in order to provide those services. Our service providers are contractually bound to protect your personal information and may not use or otherwise distribute them except as required by law. However, our fraud detection service providers may use, but not distribute your personal information for the purpose of detecting fraud.
- *On-property Services:* We may share personal information with third-party providers of on-property services such as concierge services, spa, restaurant services or festive dinners.
- *Business Transactions:* As we develop our business, we might sell, buy, restructure or reorganize businesses or assets, or cease being the manager or franchisor of a hotel that is currently part of our portfolio. In such circumstances, TRACON SRL may transfer, sell or assign information collected and personal information, to one or more affiliated or unaffiliated third parties in connection with these business transactions. To the extent that local laws require it, we will provide notice of our intent to transfer personal data to a third party for this purpose, and explain how you can object to such transfer.
- *Other:* In addition, TRACON SRL may disclose personal information in order to: (a) comply with applicable laws, (b) respond to governmental inquiries or requests from public authorities, (c) comply with valid legal process, (d) protect the rights, privacy, safety or property of TRACON SRL, site visitors, guests, employees or the public, (e) permit us to pursue available remedies or limit the damages that we may sustain, (f) enforce our websites' terms and conditions, and (g) respond to an emergency.

Sensitive Information

The term "sensitive information" refers to information related to your racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health, sex life, or sexual orientation, genetic information, criminal background, and any biometric data used for the

purpose of unique identification. In some jurisdictions, mobile phone numbers, location data, and information contained on identity documents also are considered sensitive information.

We do not generally collect sensitive information unless it is volunteered by you or unless we are required to do so pursuant to applicable laws or regulations. We may use health data provided by you to serve you better and meet your particular needs.

Personal information from children

We do not knowingly collect personal information from individuals under 16 years of age. As a parent or legal guardian, please do not to allow your children to submit personal information without your permission.

Links to third-party websites and services

Our sites may contain links to third parties' websites. Please note that we are not responsible for the collection, use, maintenance, sharing, or disclosure of data and information by such third parties. If you provide information on and use third-party sites, the privacy policy and terms of service on those sites are applicable. We encourage you to read the privacy policies of websites that you visit before submitting personal information.

TRACON SRL may also partner with a limited number of Internet providers to offer Internet access to our guests. Your use of on-property Internet service is subject to the third-party Internet provider's terms of use and privacy policy. You can access those terms and policies using the links on the service sign-in page, or by visiting the Internet provider's website.

Protecting personal information

TRACON SRL will take reasonable measures to: (a) protect personal information from unauthorized access, disclosure, alteration or destruction, and (b) keep personal information accurate and up-to-date as appropriate. TRACON SRL employs a robust internal team of dedicated information security professionals who are responsible for creating, updating and managing TRACON SRL security program.

We also seek to require our affiliates and service providers with whom we share personal information to exercise reasonable efforts to maintain the confidentiality of personal information about you. For online transactions, we use reasonable technological measures to protect the personal information that you transmit to us via our site. Unfortunately, however, no security system or system of transmitting data over the Internet can be guaranteed to be entirely secure.

Changing and accessing your personal information

To the extent required by applicable law, you may be able to request that we inform you about the personal information we maintain about you and, where appropriate, withdraw your consent for certain data processing activity and/or request that we update, correct, delete, and/or stop processing your personal information. We will make all required updates and changes within the time specified by applicable law and as required by law. When permitted by law, we may charge an appropriate fee to cover the costs of responding to the request. Such requests may be submitted by writing to dataprotection@tracon.ro or 16 Splaiul Unirii, Muntenia Business Center, 8th Floor, Rooms. 810, 811, 812, Bucharest, Romania. To protect your confidentiality, we can only respond to such requests to the email address that you have registered or otherwise provided to us. In addition, in some circumstances based on applicable law, you may request that we cease sharing personal information about you with our business partners or that TRACON SRL cease using personal information about you by contacting us using the email or mailing address above. We will seek to honor those requests consistently with applicable law.

Retaining personal information

We keep your personal data for the period necessary to meet the purpose for which it was collected, usually the duration of any contractual relationship and for any subsequent period as required or permitted by applicable law. Our data retention policies reflect the applicable status of prescription periods and legal requirements.

We will destroy your personal information as early as practicable and in a way that the information may not be restored or reconstructed.

If printed on paper, the personal information will be destroyed in a secure manner, such as by cross-shredding or incinerating the paper documents or otherwise and, if saved in electronic form, the personal information will be destroyed by technical means to ensure the information may not be restored or reconstructed at a later time.

Data subject rights

Access, Correction and Erasure Requests

You have the right to: ask us to confirm whether we are processing your personal information; receive information on how your data is processed; obtain a copy of your personal information; request that we update or correct your personal information and/or to request that we delete personal information in certain circumstances.

Right to Object to Processin

You have the right to request that TRACON SRL cease processing of your personal information: for marketing activities, including profiling; for statistical purposes and/or where such processing is based on our legitimate business interests, unless we are able to demonstrate a compelling legitimate basis for such processing or we need to process your personal information for the establishment, exercise or defense of a legal claim

Right to Restrict Processing

You have the right to request that TRACON SRL limit the processing of your personal information: while TRACON SRL is evaluating or in the process of responding to a request by you to update or correct your personal information; where such processing is unlawful and you do not want TRACON SRL to delete your data; where TRACON SRL no longer requires such data, but you want us to retain the data for the establishment, exercise or defense of a legal claim and/or where you have submitted an objection to processing based on our legitimate business interests, pending our response to such request.

Where we limit the processing of your personal information pursuant to your request, we will inform you prior to re-engaging in such processing.

Data Portability Requests

You have the right to request that we provide you or a third party that you designate with certain of your personal information in a commonly used, machine readable format. Please note, however, that data portability rights apply only to personal information that we have obtained directly from you and only where our processing is based on consent or the performance of a contract.

Submitting Requests

Your requests may be submitted in writing to dataprotection@tracon.ro or to the TRACON SRL Data Protection Officer at 16 Splaiul Unirii, Muntenia Business Center, 8th Floor, Rooms. 810, 811, 812, Bucharest, Romania. You may also update your personal information as provided Section Changing and Accessing Your Personal Information.

We will respond to all such requests within 30 days of our receipt of the request, unless there are extenuating circumstances, in which event we may take up to 60 days to respond. We will inform you if we expect our response to take longer than 30 days. Please note, however, that certain personal information may be exempt from such rights pursuant to applicable data protection laws. In addition, we will not respond to any request unless we are able to appropriately verify the requester's identity. We may charge you a reasonable fee for subsequent copies of data that you request.

If you have concerns about our data practices or the exercise of your rights, you may either contact TRACON SRL at dataprotection@tracon.ro or the supervisory authority in the Member State of your residence.

Right to Withdraw Consent

You have the right to withdraw your consent to any processing that we conduct solely based on your consent (such as sending direct marketing materials to your personal email account). You may withdraw your consent to marketing activities by following the instructions on any marketing emails, or contacting dataprotection@tracon.ro.

Choices-Marketing communications

If you have given us your contact information (mail address, fax number, email address or phone number), we may want to inform you in accordance with any preferences you have expressed, and with your consent where required, about our products and services or invite you to events via email, online advertising, social media, WeChat, WhatsApp, telephone, text message (including SMS and MMS), push notifications, in-app alerts, postal mail, our customer service call center, and other means .

If you prefer not to receive email marketing materials from us, you may opt-out at any time by using the unsubscribe function in the email or by requesting to dataprotection@tracon.ro
To opt out of text messages, reply "STOP" to the message you received.

Policy modifications

We may modify this Policy from time to time. When we make material changes to this Policy we will post a link to the revised Policy on the homepage of our site, and if you have registered for any of your products or services, will may also inform you through a communications channel that you have provided. You can tell when this Policy was last updated by looking at the link and at the date at the top of the Policy. Any changes to our Policy will become effective upon posting of the revised Policy on the site. Use of the site, any of our products and services, and/or providing consent to the updated Policy following such changes constitutes your acceptance of the revised Policy then in effect.

Contact us

If you have any questions about this Policy or how TRACON SRL processes your personal information, or if you wish to either provide a compliment or a complaint, please contact us by email at dataprotection@tracon.ro or by postal mail to 16 Splaiul Unirii, Muntenia Business Center, 8th Floor, Rooms. 810, 811, 812, Bucharest, Romania. We will respond within 30 days or sooner if practicable.