PRIVACY POLICY

Last update: 16 January 2023

Overview

We know that You care how information about You is used and shared, and We appreciate your trust that We are committed to respecting your privacy. This page states the Privacy Policy under which You, the user ("**You**" or "**Your**") may use or correspond with **https://www.comyunity.net/** forum ("**Our Forum**"), which is owned by Genesis Property ("**We**" or "**Us**" or "**Our**" or "**Genesis Property**") and details how We gather the information relating to You ("**Personal Data**") and how We may use or disclose such information.

The entity controlling the processing of Your Personal Data is **GENESIS MARKETING & PR S.R.L.**, a company incorporated in Bucharest, Romania, registered with the Trade Registry Office under no. J40/10708/2016, sole registration code 36413245, headquartered in Bucharest, 24 Preciziei Street, Building B1, Office no. 151, 1st floor, District 6.

By visiting and using Our Forum https://www.comyunity.net/, You acknowledge that You have read, understood, and consented to the processes and policies referred to in this Privacy Policy. We encourage You to read this Privacy Policy carefully. Please do not use Our Forum if You do not consent to this Privacy Policy.

Please consult this Privacy Policy each time You visit or use Our Forum. We reserve the right to periodically update and amend this Privacy Policy to reflect any changes to the way We process Your Personal Data or any changes to legal requirements and such changes will be uploaded on Our Forum prior to the change becoming applicable.

For more information on the full extent of Your rights or any questions about this Privacy Policy, please feel free to contact Us in writing at gdpr@genesisproperty.net.

Personal Data That We Collect

Personal Data is any information that relates to an identified or identifiable living individual or different pieces of information, which collected together can lead to the identification of a particular person, such as: name and surname, address, email address (*e.g., name.surname@company.com*), image, location data, Internet Protocol (IP) address, phone number, etc. Personal data that has been rendered *anonymous* in such a way that the individual

is not or no longer identifiable is no longer considered Personal Data within the scope of this Privacy Policy.

Our policy is to collect only Personal Data that is necessary for the specified purposes and to require You to communicate only the Personal Data strictly necessary for the fulfilment of these purposes.

We generally collect Your Personal Data directly from You when You use Our Forum, but We might receive information about You from other sources too. The Personal Data that We may collect, store, and use may include, but is not limited to the following kinds of Personal Data:

- **Automatic Information** namely details of Your visits to Our Forum (*Cookies*); We automatically collect and store certain types of information about Your use of Our Forum, including information about your interaction with content and services available through Our Forum

- **Information You provide Us with** when making a profile on Our Forum, using Our Forum or as a result of sending an email at gdpr@genesisproperty.net, which may include: name, surname, signature, contact details (personal phone number, email address, domicile/residence address), IP address, employer name/ Company name or Your position within the Company

- **Information from other sources** meaning that We reserve the right to supplement Your Personal Data with Personal Data received from third parties

We reserve the right to request other Personal Data necessary for the performance of the specified purposes, strictly in accordance with the applicable legal provisions and this Privacy Policy.

Please note that We do not verify the correctness, accuracy or completeness of Your Personal Data, but We make good faith efforts to enable You to update or correct Your Personal Data that We process.

Purposes of Personal Data Processing

Pursuant to the applicable legislation in force and Our Commitment to You, We undertake the obligation to use Your Personal Data in a safe way and only for the specified purposes.

We process Your Personal Data in accordance with the GDPR provisions as a data controller in accordance with all applicable specific provisions in order to offer Our information, products and services and provide You with information, products and services that You request from Us and also to carry out the following activities:

- making sure that Our Forum is presented in the most efficient manner for You and for Your device

- analyzing and improving Our information, products, services and communications/notifications to You

- protecting the security and management of Our Forum and other systems, preventing and detecting security threats, fraud or other criminal or malicious activities

- developing marketing campaigns, customer surveys, market analysis, contests, statistics, reports or other activities or promotional events and sending You invitations for Our events if You have expressly consented to be part of such activities

- complying with Our legal obligations (such as to keep accounting records and supporting documents) and ensuring the relationship with public authorities according to the applicable legal norms in civil and criminal matters

We also process Your Personal Data for any purpose related to and/or ancillary to any of the above or any other purpose for which Your Personal Data has been provided to Us.

Categories of Recipients of The Personal Data

Your Personal Data is intended for Our use, but it may be communicated to the following recipients, as the case may be:

- Our group companies, subsidiaries, affiliates and partner organizations

- authorized sub-contractors

- analytics and search engine providers that assist Us in the improvement and optimization of Our Forum

The disclosure of data to third parties is made in accordance with the legal provisions for the categories of recipients specified above.

Our Forum may contain links to other websites of Our group companies, subsidiaries, affiliates and/or partner organizations. If You follow a link to any of these websites, please note that these websites have their own privacy policies and that We do not accept any responsibility or liability for these policies. We encourage You to check these policies before You submit any Personal Data to these websites. Under no circumstances shall We have any liability whatsoever for the activities conducted by or at any website accessed from or through Our Forum.

Marketing and communications

We may use Your Personal Data for marketing and advertising purposes as described herein in the Privacy Policy. We rely on the following legal aspects when We send You electronic communications:

- **Your explicit consent** which may be withdraw at any time by following the instructions provided within the electronic communication

- **Our legitimate interest** of marketing Our information, products, services where We have a pre-existing relationship with You, provided that if You do not wish to receive emails or communications from Us or participate in our programs, events and activities, You may opt-out anytime from receiving these emails and communications by following the directions provided within the email or communication

Period For Personal Data Processing

Your Personal Data is stored for the period necessary for the purposes for which the Personal Data are processed as outlined in this Privacy Policy, but no longer than the maximum period as specified or required under the applicable laws for storage or archival purposes. Thereafter, We delete Your Personal Data within a reasonable timeframe.

Cookies

We may use cookies to help You use Our information, products and services more easily and to provide us analytics and help Us improving Our information, products, services and communications to You.

A "*cookie*" is a small file consisting of letters and numbers that will be stored on Your computer. The cookie is installed by request issued by a server to a web browser (*e.g.*, Internet Explorer, Firefox, Chrome) and it is completely "*passive*", meaning that does not contain software viruses or spyware and cannot access Your information on the hard drive. Cookies keep information in a small text file that allows Our Forum to recognize a browser. Cookies offer Us valuable feedback on how Our Forum is used by Our users, so that We can make it more efficient and accessible to Our users by creating a more valuable, useful and enjoyable browsing experience. This process does not reveal any personal information about the person viewing the page (such as a username or password) unless the person has previously given such information.

You may have the option of setting Your browser to alert You when cookies are being sent to Your computer or even to reject cookies. Alternatively, You can disable cookies at any time, but please note that doing so may affect Your experience on Our Forum and limit the way in which We may provide You with information, products and services.

Legal Ground of Personal Data Processing

Your Personal Data is processed and shared to third parties (if the case) based on the following grounds:

- You have provided Your **consent** which can be withdrawn at any time

- processing is necessary for the **performance of a contract** to which You are a party

- processing is necessary for **compliance with a legal obligation** to which We are subject

- processing is necessary in order to **protect Your vital interests** or of another natural person

- processing is necessary for the purposes of **Our legitimate interests** or of another third party, except where such interests are overridden by Your interests or fundamental rights and freedoms

To the extent that special categories of Personal Data will be required, We will request Your explicit consent in accordance with the provisions of Article 9 (2) letter a) of GDPR.

Security And Transfer of Personal Data

Ensuring the confidentiality of Your Personal Data is an important concern for Us and We designed our systems with Your security and privacy in mind. We follow the industry standards and We have implemented technical and organizational measures to attempt to maintain the integrity, confidentiality, and security of Your Personal Data in accordance with Our internal procedures regarding the storage, disclosure, and access to Personal Data. We reserve the right to update Our security practices, if and when it seems appropriate to do so.

We are headquartered in Bucharest, Romania. Your Personal Data may be accessed by Us or transferred to Us in Romania or to Our group companies, subsidiaries, affiliates, partner organizations and authorized sub-contractors who are located in the European Economic Area. By using Our Forum, You consent to the transfer, processing, storage of Your Personal Data in Romania, where Our servers are located, as well as to any other country in the European Economic Area.

We will not transfer Your Personal Data outside the European Economic Area, unless one or more of the specified guarantees or exceptions apply to the transfer, namely an adequacy decision, mandatory corporate rules, etc. For the avoidance of any doubt, We will only transfer Your Personal Data to trusted third parties who provide sufficient guarantees in respect of the technical and organizational security measures governing the processing to be carried out and who can demonstrate a commitment to compliance with those measures. For any transfer of Personal Data outside the European Economic Area to third parties, We will ensure there is adequate protection under European law.

Our Forum uses an SSL (HTTPS) security certificate to secure the exchange of information.

Your Rights and How To Exercise Them

According to the applicable legal provisions, You have the following rights:

- **the right to information** under art. 13 of the GDPR. Where Personal Data relating to You are collected, We shall, at the time when Personal Data are obtained, provide You with information concerning the extent to which we process such Personal Data and all necessary information is to be found in this Privacy Policy

- **the right of access** under art. 15 of the GDPR. You have the right to obtain from Us confirmation as to whether or not Your Personal Data are being processed, and, where that is the case, access to such Personal Data

- **the right of rectification** under art. 16 of the GDPR. You have the right to obtain from Us without undue delay the rectification of Your inaccurate Personal Data

- **the right of erasure** (*right to be forgotten*) under art. 17 of the GDPR. You have the right to request from Us the erasure of Your Personal Data without undue delay for the grounds stated in the GDPR. Please note that immediate erasure may not be possible if retention of Your Personal Data is still required to meet legal or regulatory obligations

- **the right to restriction of processing** under art. 18 of the GDPR. You have the right to obtain from Us restriction of processing under certain conditions described in the GDPR

- **the right to data portability** under art. 20 of the GDPR. Where the processing is based on Your consent or on a contract and the processing is carried out by automated means, You have the right to receive Your Personal Data in a structured, commonly used and machine-readable format and have the right to transmit those Personal Data to another controller without hindrance from Us

- **the right to object** under art. 21 of the GDPR. You have the right to object, on grounds relating to Your particular situation, at any time to processing of Your Personal Data in certain situations described in the GDPR and in such case We shall no longer process Your Personal Data unless we demonstrate compelling legitimate grounds for the processing which override Your interests, rights and freedoms for the establishment, exercise or defense of legal claims

- **the right not to be subject to a decision based solely on automated processing** under art. 22 of the GDPR. You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning You or similarly significantly affects You

Where the processing of Your Personal Data is based on Your consent only or You have given explicit consent to the processing of special categories of Personal Data, You have **the right to withdraw Your consent** at any time and as a result and We will act immediately, unless there is a legal ground in not doing so, without affecting the lawfulness of processing based on consent before its withdrawal. You may withdraw or modify Your consent in writing at gdpr@genesisproperty.net.

In case You feel that Your Personal Data is not lawfully or fairly processed by Us, You have **the right to lodge a complaint** with the supervisory authority on data protection. For more information, please contact Your local data protection authority.

In order to exercise Your rights or for more information on the full extent of Your rights, please contact Us in writing at gdpr@genesisproperty.net.

Information Regarding Children

Children merit specific protection with regard to their Personal Data, as they may be less aware of the risks, consequences and safeguards concerned and their rights in relation to the processing of Personal Data.

Use of Our Forum by individuals under the age of 18 is not allowed and We do not knowingly collect any Personal Data from children.

Other information

We process Your Personal Data in accordance with this Privacy Policy and the applicable legislation, namely Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC ("**General Data Protection Regulation**" or "**GDPR**").