WEBSITE PRIVACY POLICY

This Privacy Policy ("**Privacy Policy**") governs the processing and transfer of personal data collected or processed by Point Development, (Collectively with its affiliates and subsidiaries shall be referred to as "**Company**", "**we**", "**us**" or "**our**", and the "**Shikun and Binui Group**") when you access or use any of our websites and landing pages ("**you**" or "**your**" and "**website**"). This Privacy Policy explains what data we may collect from you, how such data may be used or shared with others, how we safeguard it and how you may exercise your rights related to your Personal Data (as defined below), as required under relevant privacy regulation, including (where applicable) the EU General Data Protection Regulation ("**GDPR**").

If you have any questions regarding this Privacy Policy or our data practices, you are welcome to contact us at: office@point-development.ro.

You are not required by law to provide us with any Personal Data. However, please note that some of our services and website features require the processing of certain Personal Data and without such data we may not be able to provide you with all or part of such services and features.

A. POLICY AMENDMENTS:

We reserve the right to amend this Policy from time to time, at our sole discretion. The most recent version of the Policy will always be posted on the website. The updated date of the Policy will be reflected in the "Last Modified" heading. Any amendments to the Policy will become effective immediately, unless we notify you otherwise. If we materially change the way in which we process your previously collected personal data, we will provide you with prior notice, or where legally required, request your consent prior to implementing such changes. In case of material change in the policy you have the right to withdraw your consent, unless we must keep your personal data due to legal requirements. We strongly encourage you to review this Policy periodically to ensure that you understand our most updated privacy practices.

B. CONTACT INFORMATION AND DATA CONTROLLER INFORMATION:

Point Development SRL, as part of the Shikun and Binui group is the Data Controller (as such term is defined under the GDPR or equivalent privacy legislation) of your Personal Data of the Personal Data collected from you as a visitor or user of our website.

You may contact us as follows:

- **By email:** office@point-development.ro
- **By Phone:** +40 756 135 463 (Mon-Fri 9:00 am - 5:30 pm)
- **By Mail:**

  Point Development SRL

  2nd Floor, Henley Building,

  15-25 Bucuresti Nord Road,

  Voluntari, Ilfov County, Romania

Last Modified: March 21, 2025

C. DATA SETS WE COLLECT AND FOR WHAT PURPOSE:

Below you can find information regarding the purposes for which we process your personal data as well as our lawful basis for processing, the definition of "personal" and "non-personal" data, and how it is technically processed.

Non-Personal Data

During your interaction with the Website, we may collect aggregated, non-personal non-identifiable information ("**Non-Personal Data** "). We are not aware of the identity of the user from which the Non-Personal Data is collected. We collect Non-Personal Data regarding your use of the website, such as the scope, frequency, latency, pages accessed and viewed, time and date stamp, interactions with content and materials displayed through our website, language preference, and other technical information regarding the device used to access the website, for example type of device, type of browser, operating system, etc. Non-Personal Data may be used by us without limitation and for any purpose.

We may sometimes process and anonymize or aggregate Personal Data and identifiable information in a manner that shall create a new set of data that will be Non-Personal Data. Such a new data set can no longer be associated with any identified natural person.

If we combine Personal Data with Non-Personal Data, the combined information will be treated as Personal Data or for as long as it remains combined.

Personal Data

We may also collect from you, directly or indirectly, during your access or interaction with the website, individually identifiable information, namely information that identifies an individual or may, with reasonable effort, be used to identify an individual ("**Personal Data**"). The types of Personal Data that we collect as well as the purpose for processing and the lawfulness are specified in the table below.

On our website, we do not knowingly collect or process any Personal Data constituting or revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic data, biometric data, data concerning a person's health or data concerning a person's sex life or sexual orientation ("**Special Categories of Personal Data**").

The table below details the processing of **Personal Data**, the purpose, lawful basis, and processing operations:

DATA SET	PURPOSE AND OPERATIONS	LAWFUL BASIS PER GDPR
Contact Information: If you voluntarily contact us, e.g., through a "contact us" form in our website, you may be required to provide us with certain personal data such as your name, job title, company name, email address, and any additional information you decide to share with us.	We will use this data to respond to your inquiry. The correspondence with you may be processed and stored by us in order to improve our internal operations, as well as in the event we reasonably determine it is needed for future assistance or to handle any dispute you might have with us.	We process such Contact Information subject to our legitimate interest.

	We may retain and manage such information through the use of external services and platforms such as CRM systems.	
Newsletter & Updates Registration: In the event you sign up to receive our newsletter or other promotional materials, you will be requested to provide your contact details, such as email address.	We will use the information you provide in order to include you in our mailing list and send you the materials you have signed up to receive.	Our lawful basis for the processing of this data is your consent. You may withdraw your consent at any time by clicking the "unsubscribe" link which will be included in the email we will send you. You may also contact us through the above means of contact and request to unsubscribe.
Potential Purchasers Information: in case you will engage us for purchasing a unit or apartment in one of our projects, we may collect and process further information from you, such as first and last name, date of birth, place of birth including district, last name at birth, address of residence and contact address, bank account, email, telephone number, IP address, Birth ID No., National ID Card No., and potentially passport number and marital status.	We use such data for preparing contractual documentation necessary for the sales, handover, management, and warranty claims on the subject of sale, i.e. residential and non-residential units, or their shares in the same (i.e. in particular preparation: reservation agreement, future purchase agreement, purchase agreement for a residential / non-residential unit, pledge agreement, proposal for entry of ownership rights and/or pledges into the Land Register, handover report, warranty claim report, real estate acquisition tax return, etc.).	We will collect and process such data as part of negotiating a contract with you.

Please note that the actual **processing operation** per each purpose of use and lawful basis detailed in the table above may differ. Such processing operation usually includes a set of operations made by automated means, such as collection, storage, use, disclosure by transmission, erasure, or destruction. We generally do not transfer personal data to third-party countries outside of European Union. Should there be a need to do such transfer will do it with due care and technical protection on the same lawful basis as stipulated in the table above.

In addition, we may use certain Personal Data to prevent potentially prohibited or illegal activities, fraud, misappropriation, infringements, identity thefts, and any other misuse of the website and to enforce the Terms, as well as to protect the security or integrity of our databases and the website, and to take precautions against legal liability. Such processing is based on our legitimate interests.

D. HOW WE COLLECT YOUR INFORMATION:

Depending on the nature of your interaction with us, we may collect the above detailed information from you, as follows:

- ***Automatically*** – we may use cookies (as elaborated in separate section) or similar tracking technologies (such as pixels, tags, agent, etc.) to gather some information automatically.
- ***Provided by you or about you voluntarily –*** *we will collect information if and when you choose to* provide us with the information, such as contact us form, through negotiating with us and engaging our sales department, etc.
- ***Provided from third parties –*** where permitted under applicable law and provided with your consent for cookie usage, we may enrich the Personal Data collected about you with data provided by third parties.