

PRIVACY POLICY

MILLUU APP AND SITE

Last updated: 19.08.2019

Your privacy is one of our fundamental commitments, and therefore, we take utmost care to process your personal data in accordance with the principles set forth in the applicable legislation, including without limitation the General Data Protection Regulation no. 679/2016 (“**GDPR**”). We recognize the importance of maintaining the confidentiality, integrity and security of your personal information (“**Personal Data**”) and have written this privacy policy (“**Policy**”) to explain how your Personal Data is collected, stored, used and disclosed by **SC PROPTECH CORP SRL**, a company incorporated under the Romanian law, having its headquarters at 56 PITESTI Street, SLATINA, OLT County, Tax Code 41276829, registered with the Trade Registry under no. J28/788/2019 (“**Milluu**”, “**Us**”), as a data controller, with respect to (i) your access to and use of our application which aims at connecting the Listers with the Tenants („**App**”), (ii) the access to, and use of our website available at the URL www.milluu.com („**Site**”) and (iii) the access to, and use of the content of the App and of the Site including of the services provided by Milluu (“**Services**”).

Each time we are required by the applicable law or, otherwise, want to use this legal basis, we will request your free, informed, specific and unequivocal consent for the processing of your Personal Data. By expressing your consent, you agree that we can collect, use, reveal, process and transfer your Personal Data in accordance with this Policy.

We reserve the right to amend the provisions of this Policy from time to time. If we make changes to this Policy, we will make the updated version available on the App and we will update the “Last updated” date. We will also inform you on the changes that have occurred, to ensure that you are aware of how we use your Personal Data. Any amendments to this Policy will apply on the date that they are made, with the exception of changes which require your prior consent, and which will apply as of the moment when you express such consent.

For the avoidance of any doubt, we are not obliged to inform you, by using the contact details associated with your account on the App, in respect to any and all of the changes to this Policy.

Any capitalized term which is not defined in this Policy will have the meaning set forth in the terms and conditions (“**Terms**”) applicable to the App and the Site.

1. APPLICABILITY

This Policy applies strictly to the processing of Personal Data carried out by Milluu as a data controller.

For the avoidance of doubt, this Policy does not apply to the processing of Personal Data performed by Milluu as a data processor.

2. THE SITE

As a rule, we do not process Personal Data on our Site. However, in case we process such Personal Data, this Policy shall become applicable.

3. CATEGORIES OF PERSONAL DATA, PURPOSES OF PROCESSING, AND LEGAL GROUNDS

A. FOR LISTERS AND TENANTS

3.1. Registration on our App

a. Registration directly on our App

On our App you can register and create an account. In this case, we will need your first and last name, image, age, email address and phone number.

When you create an account on our App, we will validate your email address and your phone number. For this purpose, Milluu will verify the contact details by sending a dedicated link to be confirmed via email and a verification code to the phone number. .

Additionally, you have the possibility to upload your ID card in order to allow us verify your identity. In such a case, we will process the Personal Data included in your ID card.

Purpose of processing	Legal ground
The purpose of this processing is to create the account, to provide our services through the App and to provide help in using the App.	<ul style="list-style-type: none">• Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract (<i>art. 6 para. 1, let. b GDPR</i>);• Our legitimate interest in increasing the trust in our App, by creating a safe and transparent community, based on trust (<i>art. 6 para. f, let. b GDPR</i>);
The verification of your ID card aims at ensuring an increased level of trust as regards your profile on our App.	<ul style="list-style-type: none">• Your consent (<i>art. 6 para. 1, let. a GDPR</i>).

b. Registration and log in with Facebook, LinkedIn or Google accounts

On our App, you also have the possibility to register with your Facebook, LinkedIn or Google accounts.

Facebook Login

The App offers you the possibility to register using your Facebook access. Before registering, you are led to a Facebook page where you can log in using your Facebook username and password. As a consequence, the App will be connected to your Facebook profile. The connection automatically causes the App to receive from Facebook the information you agreed to: Facebook ID, email, first name, last name, profile picture, likes. This information will be processed by us in order to offer you the possibility of creating the account and to the extent necessary to identify you in the context of the features offered by the App and to offer you the various features on our App.

We are not responsible for the processing by Facebook of your Personal Data. For further information about Facebook's privacy settings, please refer to Facebook's privacy policy.

LinkedIn Login

The App also offers you the possibility to register using your LinkedIn access. Before registering, you are led to a LinkedIn page where you can log in using your LinkedIn username and password. As a consequence, the App will be connected to your LinkedIn profile. The connection automatically causes the App to receive from LinkedIn the information you agreed to: LinkedIn ID, email, first name, last name, profile picture. This information will be processed by us in order to offer you the possibility of creating the account and to the extent necessary to identify you in the context of the features offered by the App and to offer you the various features on our App.

We are not responsible for the processing by LinkedIn of your Personal Data. For further information about LinkedIn privacy settings, please refer to LinkedIn's privacy policy.

Google Login

The App also offers you the possibility to register using your Google access. Before registering, you are led to a Google page where you can log in using your Google username and password. As a consequence, the App will be connected to your Google profile. The connection automatically causes the App to receive from Google the information you agreed to: email, first name, last name, profile picture. This information will be processed by us in order to offer you the possibility of creating the account and to the extent necessary to identify you in the context of the features offered by the App and to offer you the various features on our App.

We are not responsible for the processing by Google of your Personal Data. For further information about Google privacy settings, please refer to Google's privacy policy.

Purpose of processing	Legal ground
<p>The purpose of this processing is to create the account, to log into the App and to provide our services through the App and to provide help in using the App.</p>	<ul style="list-style-type: none"> • Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract (<i>art. 6 para. 1, let. b GDPR</i>); • Our legitimate interest in increasing the trust in our App, by creating a safe and transparent community, based on trust (<i>art. 6 para. f, let. b GDPR</i>);

3.2. Invoicing

When using our App, we will issue invoices for the payments made on our App, such as the payment of the Milluu points or of the rent. In this case, we will process your first name, last name and address.

Purpose of processing	Legal ground
<p>The purpose of this processing is to issue the invoices for the payments made on our App.</p>	<ul style="list-style-type: none"> • Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract (<i>art. 6 para. 1, let. b GDPR</i>); • Processing is necessary for compliance with a legal obligation to which the controller is subject (<i>art. 6 para. 1, let. c GDPR</i>);

3.3. Payments and bank cards

When you make a payment in our App (e.g., when you buy Milluu points or pay the rent) or when you add a bank card in our App, we will process your bank card details (first and last name, card number, CCV, expiring date).

Purpose of processing	Legal ground
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<p>The purpose of this processing is to send the bank card details to the payment processor in order to process the payment.</p>	<ul style="list-style-type: none"> Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract (<i>art. 6 para. 1, let. b GDPR</i>);
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3.4. Concluding the insurance policy

In order to offer you the insurance service, we need to process the following Personal Data: first and last name, personal identification number, email address, the contractual position (lessor or lessee), the lease agreement number and the execution date, the number of the lease agreements concluded and/or terminated through our App, overview statistical data, the Property type, the insurance/leasing period, the address of the insured/leased Property.

We will transfer this Personal Data to the insurance company. We are not responsible for the processing of Personal Date by the insurance company. For more information about how the insurance company processed your Personal Data, please refer to its privacy policy. [<https://www.milluu.com/ro/nota.pdf>]

Purpose of processing	Legal ground
<p>The purpose of this processing is to offer you the insurance service.</p>	<ul style="list-style-type: none"> Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract (<i>art. 6 para. 1, let. b GDPR</i>);

3.5. Contractual notifications

During the provision of our services, we will use your email address and your phone number to notify you of any changes in the Terms of the App and in connection with any other issues related to the performance of the contract between you and Milluu.

Purpose of processing	Legal ground
<p>The purpose of this processing is to carry out contractual notices in accordance with the Terms of the App.</p>	<ul style="list-style-type: none"> Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering

	into a contract (<i>art. 6 para. 1, let. b GDPR</i>);
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3.6. Contact

You can contact us in different ways: by support form, or by using our chat. In this case, in general, we will process the following Personal Data: first name, last name, email and any other information you voluntarily provide when you contact us.

When you contact us by using our chat, we might also process your Personal Data included in your App profile.

Purpose of processing	Legal ground
In this situation, we will use your Personal Data only to contact you in connection with the requested offer or in connection with the resolution of the problem.	<ul style="list-style-type: none"> Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract (<i>art. 6 para. 1, let. b GDPR</i>); Our legitimate interest in ensuring communication with our customers and providing the necessary support for the use of the App (<i>art. 6 para. 1, let. f GDPR</i>);

3.7. Marketing messages

You can opt in to receive marketing messages via SMS, email, push notification.

Purpose of processing	Legal ground
If you opt to receive such marketing messages, we will use your telephone number to send you marketing messages about our activities and promotions.	<ul style="list-style-type: none"> Your consent. (<i>art. 6 para. 1, let. a GDPR</i>).

You can revoke your prior consent at all times and without any costs, with altering consequences for the future.

3.8. Analytical data

When using our App, we process certain information regarding your activity in order to analyze the use of our App. Such information includes, for example, your navigation.

This information is not collected in order to be associated to identified persons. However, insofar such information leads to the identification of a user, the provisions of this Policy shall become applicable.

Purpose of processing	Legal ground
We use this data for the sole purpose of obtaining anonymous statistical information concerning the use of the App.	<ul style="list-style-type: none"> • Our legitimate interest in the improvement of our App (<i>art. 6 para. 1, let. f GDPR</i>);

B. FOR LISTERS

3.9. Start using the App

When you start using the App, we will need certain information in order for us to better connect the Listers and the Tenants and to create your profile.

As a Lister, you have to provide certain information: date of birth, gender, job, and other information about the Property: location, Lister preferences (type of Tenants, age range of Tenants, the professional status of the Tenants), house rules & facts (smoking, pets, guarantors, redecoration, Tenant's ID verification, maximum number of persons accepted, sublet).

Purpose of processing	Legal ground
The purpose of this processing is to create the Lister profile and to establish the Property details.	<ul style="list-style-type: none"> • Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract (<i>art. 6 para. 1, let. b GDPR</i>); • Our legitimate interest in increasing the trust in our App, by creating a safe and transparent community, based on trust (<i>art. 6 para. f, let. b GDPR</i>);

3.10. Adding information to your profile

Once you have completed the setting up process and created your account, you can fill in other details about you in order to complete your profile: details about your personality and your interests; other relevant documents requirements (bank deposit / deposit, proof of employment / university, income proof / guarantor, previous landlord reference). The profile shall be available to the Tenants.

Purpose of processing	Legal ground
The purpose of this processing is to complete the Lister profile in order to better connect the Listers and the Tenants and to allow the Tenants to find out certain details about the Listers in order to decide whether he/she wants to proceed with the rent process.	<ul style="list-style-type: none"> <li data-bbox="847 286 1394 488">• Our legitimate interest in increasing the trust in our App, by creating a safe and transparent community, based on trust (<i>art. 6 para. f, let. b GDPR</i>);

3.11. Listing a Property

When a Property is listed on our App, we will need your first name, image, age, profession, rating score. This Personal Data shall be mentioned in the post.

In addition, the post shall contain all the information in relation to the Property, such as location, details, features, building facilities, house rules and facts, description, etc. This information or documents might contain Personal Data, in which case this Privacy Policy becomes applicable.

We will also need the Property plan, which might contain your name or other Personal Data. The Property plan shall be visible to all the potential Tenants.

In addition, when you list a Property, we will request a document from you such as a sale purchase agreement, a lease agreement, utility invoice, or any other relevant document, in order to verify that you are entitled to list the Property. In this case we will process the Personal Data included in the respective document. However, the respective document shall not be published on the App.

Purpose of processing	Legal ground
The purpose of this processing is to publish the Property.	<ul style="list-style-type: none"> <li data-bbox="847 1411 1394 1697">• Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract (<i>art. 6 para. 1, let. b GDPR</i>); <li data-bbox="847 1724 1394 1921">• Our legitimate interest in increasing the trust in our App, by creating a safe and transparent community, based on trust (<i>art. 6 para. f, let. b GDPR</i>);

As regards the verification operation, we will process the Personal Data in order to ensure that the you are entitled to list the Property.	<ul style="list-style-type: none"> • Our legitimate interest in increasing the trust in our App by ensuring that all the properties listed on our App are real (<i>art. 6 para. f, let. b GDPR</i>);
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3.12. Webview onboarding

When using the webview onboarding functionality, the Listers have to fill in the same Personal Data indicated in section 3.11 above. As such, all the information provided by section 3.11 applies accordingly.

When using this functionality, we also offer the Listers the possibility to help them filling in the Property listing details. In this case, we will process the Personal Data indicated in section 3.11 which applies accordingly.

In order to finalize the listing, the Lister has to register and create an account by filing in the Personal Data indicated in section 3.1 let. a) above, which applies accordingly.

3.13. Adding the bank account

As a Lister, you need to add a bank account in order to receive the money paid by the Tenant (e.g., rent, guarantee, etc.). In this context, we will process the following Personal Data: first and last name, address, bank, the IBAN account and the SWIFT code (for the international bank account of natural persons) and first and last name of the company's representative (for legal persons).

Purpose of processing	Legal ground
The purpose of the processing of your bank details is to transfer the money paid by the Tenant.	<ul style="list-style-type: none"> • Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract (<i>art. 6 para. 1, let. b GDPR</i>);

3.14. Concluding the Lease Agreement

On our App, you have the possibility to conclude the Lease Agreement with the Tenant. In such a case, we will process the following Personal Data: first and last name, address, ID series and number (for natural persons), first and last name of the company's representative (for legal persons).

Purpose of processing	Legal ground
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<p>The purpose of this processing is to fill in the parties' details in the Lease Agreement to be concluded on our App.</p>	<ul style="list-style-type: none"> • Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract (<i>art. 6 para. 1, let. b GDPR</i>); • Our legitimate interest in increasing the trust in our App, by creating a safe and transparent community, based on trust (<i>art. 6 para. f, let. b GDPR</i>);
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C. FOR TENANTS

3.15. Start using the App

When you start using the App, we will need certain information in order for us to better connect the Listers and the Tenants and to create your profile.

As a Tenant, you have to provide certain information: occupation, professional status, working place.

In addition, you have to add other information in relation to the type of Property you are searching, such as priority (budget, location, features), city, neighborhood, number of rooms, who's moving, pets, smoking allowance, move-in date, lease period, budget. Additionally, for a better search of the Properties, you could also add other details about the Property you are looking for, such as number of bathrooms, etc. This information or documents might contain Personal Data, in which case this Privacy Policy becomes applicable.

Purpose of processing	Legal ground
<p>The purpose of this processing is to create the Tenant profile and to better connect the Listers and the Tenants by improving the search criteria.</p>	<ul style="list-style-type: none"> • Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract (<i>art. 6 para. 1, let. b GDPR</i>); • Our legitimate interest in increasing the trust in our App, by creating a safe and transparent

	community, based on trust (<i>art. 6 para. f, let. b GDPR</i>);
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3.16. Adding information to your profile

Once you have completed the setting up process and created your account, you can fill in other details about you in order to complete your profile: details about your personality and your interests; your income; other relevant documents (bank deposit / deposit, proof of employment / university, income proof / guarantor, previous landlord reference).

Purpose of processing	Legal ground
The purpose of this processing is to complete the Tenant profile in order to better connect the Listers and the Tenants and to allow the Listers to find out certain details about the Tenants in order to decide whether he/she wants to proceed with the rent process.	<ul style="list-style-type: none"> Our legitimate interest in increasing the trust in our App, by creating a safe and transparent community, based on trust (<i>art. 6 para. f, let. b GDPR</i>);

3.17. Requesting a match

When you request a match on our App, the Lister shall have access to your following Personal Data: first name, age, profession, working place, professional status, smoking habit, your *About me* description, Facebook likes, and other information in relation to your movement (move-in date, lease period, pets).

Purpose of processing	Legal ground
The purpose of this processing is to allow the Lister to find out certain details about the Tenant in order to decide whether he/she wants to proceed with the rent process.	<ul style="list-style-type: none"> Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract (<i>art. 6 para. 1, let. b GDPR</i>); Our legitimate interest in increasing the trust in our App, by creating a safe and transparent community, based on trust (<i>art. 6 para. f, let. b GDPR</i>);

3.18. Applying for rent

You have the possibility to apply for a Property listed on our App. In this case, we will need the following Personal Data: the co-Tenant (family, couple, friend, etc), the lease period.

The Tenants have the possibility to indicate the income range and add any other information or document. This information or documents might contain Personal Data, in which case this Privacy Policy becomes applicable.

All this information shall be visible only to the Lister.

Purpose of processing	Legal ground
<p>The purpose of this processing is to apply for a Property.</p>	<ul style="list-style-type: none"> • Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract (<i>art. 6 para. 1, let. b GDPR</i>); • Our legitimate interest in performing the contractual relationships with our customers – the Listers listing the properties (<i>art. 6 para. 1, let. f GDPR</i>).

3.19. Concluding the Lease Agreement

On our App, you have the possibility to conclude the Lease Agreement with the Lister. In such a case, we will process the following Personal Data: first and last name, address, ID series and number (for natural persons), first and last name of the company representative (for legal persons).

Purpose of processing	Legal ground
<p>The purpose of this processing is to fill in the parties' details in the Lease Agreement to be concluded on our App.</p>	<ul style="list-style-type: none"> • Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract (<i>art. 6 para. 1, let. b GDPR</i>); • Our legitimate interest in increasing the trust in our App, by creating a safe and transparent

	community, based on trust (<i>art. 6 para. f, let. b GDPR</i>);
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3.20. Managing utilities bills

When using this feature, the Tenants will provide certain Personal Data included in the bills and the payment proofs uploaded in the App, such as the first name, last name, address or any other Personal Data included thereof.

Purpose of processing	Legal ground
The purpose of this processing is to allow the Listers and the Tenants to manage the utilities bills and supervise their payment to be on time.	<ul style="list-style-type: none"> Our legitimate interest in increasing the trust in our App, by creating a safe and transparent community, based on trust (<i>art. 6 para. f, let. b GDPR</i>);

4. FAILURE TO PROVIDE PERSONAL DATA

You may refuse to provide certain Personal Data (indicated above) but, in such a case, you may not be able to benefit from certain App services and features, including, but not limited to, the creation of a user account or contacting you to solve your problem and to provide support.

5. PROCESSING PERSONAL DATA BASED ON OUR LEGITIMATE INTEREST

When we process on the lawful basis of legitimate interest, we apply the following tests to determine whether it is appropriate:

- **The purpose test** – is there a legitimate interest behind the processing?
- **Necessity test** – is the processing necessary for that purpose?
- **Balancing test** – is the legitimate interest overridden, or not, by the individual's interests, rights or freedoms?

For more information on how we process the Personal Data on the lawful basis of legitimate interest, please contact us at privacy@milluu.com.

6. AUTOMATIC PROCESSING OF PERSONAL DATA

Your Personal Data will not be processed for taking decisions based solely on automatic processing that would result in legal effects concerning you or could similarly significantly affect you.

7. STORAGE PERIOD

As a rule, we will process your Personal Data during the existence of your account in our App.

Personal Data collected based on your consent will be processed until the date of withdrawal of the consent.

The Personal Data included in the documents requested in order to perform certain verifications (Property title, ID card) will be processed only as long as it takes to perform the verification and will be deleted within 24 hours as of the moment of validation. However, in the context of concluding the insurance policy, we will retain the ID card until we will send it to the insurance company.

In certain circumstances, we may retain your Personal Data for longer periods of time, for example if we are obliged to do so in accordance with the legal, regulatory, tax or accounting requirements.

We may also keep your Personal Data for longer periods of time so that we have accurate records of your dealings with us in the event of any complaints or challenges, or if we reasonably believe there is a prospect of litigation relating to your Personal Data or dealings.

8. TRANSFER OF PERSONAL DATA

Your Personal Data is filed and stored on the servers of our contractual partners that are helping us to provide our services to you.

We may transfer Personal Data, as far as necessary, to the following categories of recipients:

- contractual partners;
- subcontractors;
- payment processors;
- insurance companies;
- companies offering IT services;
- software or hardware vendors;
- market research companies;
- marketing companies;
- public authorities, courts of law or arbitral tribunals, and authorities competent to investigate criminal offence.

These recipients can be located in the European Union and/or in the European Economic Area. Where recipients are located outside the European Union and the European Economic Area, including in countries not recognized as ensuring an adequate level of protection, the transfer of Personal Data shall be carried out only if there are appropriate guarantees, in accordance with applicable law. In this respect, we rely on several

guarantees, such as the Privacy Shield certificate or the standard contractual clauses issued by the European Commission. You may receive from us a list of recipients from third countries, as well as a copy of the agreed provisions that ensure an adequate level of protection of Personal Data. For any request to this effect, please contact us at the contact details mentioned below.

9. SECURITY

The security of your Personal Data is important to us. Your Personal Data will therefore be processed by applying reasonable technical and organizational measures to protect Personal Data, such as limiting access to Personal Data, encryption or anonymization of Personal Data, storage on secure environments. However, despite our efforts, we cannot always guarantee the effectiveness of the security measures implemented, and therefore we cannot guarantee the security of Personal Data at any time.

10. RIGHTS IN CONNECTION WITH THE PROCESSING OF YOUR PERSONAL DATA

10.1. Your rights

You have the following rights in connection with the processing of your Personal Data:

Access right: You have the right to obtain from us confirmation that your Personal Data is processed by us, as well as information on the specific processing, such as: the purposes of processing, categories of processed Personal Data, recipients of Personal Data, the period for which Personal Data is stored, if we transfer the Personal Data abroad and how we protect it, your rights, the right to lodge a complaint before the supervisory authority, the source of your Personal Data.

Right to rectification: You have the possibility to request rectification of your Personal Data, provided that the applicable legal requirements are met. In the event of errors, after notification, we will immediately correct your Personal Data.

Right to erasure: In certain cases, you have the possibility to request the deletion of Personal Data, namely when: **(i)** the Personal Data are no longer necessary in relation to the purposes for which they were collected or otherwise processed; **(ii)** you withdraw consent on which the processing is based according and where there is no other legal ground for the processing; **(iii)** you exercise the right to object to the processing; **(iv)** the Personal Data have been unlawfully processed. We are not obliged to comply with your request when the processing is necessary (among others) for compliance with a legal obligation or for the establishment, exercise or defense of legal claims. There are also other circumstances in which we are not obliged to comply with this request for the deletion of Personal Data.

Restriction of processing: You may request us to restrict the processing of your Personal Data in the following circumstances: **(i)** you contest the accuracy of the Personal Data, for a period enabling us to verify the accuracy of the Personal Data; **(ii)** the processing is unlawful and then you oppose to the erasure of the Personal Data and

request the restriction of their use instead; **(iii)** we no longer need the Personal Data for the purposes of the processing, but you require them for the establishment, exercise or defense of legal claims; **(iv)** you have objected to processing, pending the verification whether our legitimate grounds override yours. However, we can continue to process your Personal Data **(i)** when you consent; **(ii)** for the establishment, exercise or defense of legal claims or **(iii)** for the protection of the rights of another natural or legal person.

Right to data portability: Insofar the Personal Data is processed based on your consent or on the execution of the agreement and the processing is carried out by automated means, you have the right to have your data Personal Data provided to you in a structured format, which is currently used and can be read automatically and you have the right to request us to transfer this Personal Data to another controller. This right shall not adversely affect the rights and freedoms of others.

Right to opposition: In certain situations, such as when we process your Personal Data on the basis of a legitimate interest, you have the right to object to the processing of your Personal Data by us. In the event of unjustified objection, Milluu is entitled to continue processing Personal Data.

Objection to direct marketing: You can also object to the processing of your Personal Data for the purpose of sending marketing messages.

Revocation of consent: Insofar you consented to the processing of your Personal Data, you can at all times revoke your consent, without affecting the lawfulness of processing based on consent before its withdrawal.

Right not to be subject to any automatic individual decisions: 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. Such right cannot be exercised when the decision: **(i)** is necessary for entering into, or performance of, a contract between you and us; **(ii)** is authorized by law which lays down suitable measures to safeguard your rights and freedoms and legitimate interests; or **(iii)** is based on your explicit consent.

Right to lodge a complaint with the supervisory authority: You have the right to lodge a complaint with The National Supervisory Authority for Personal Data Processing (“DPA”) in relation to any breach of your rights regarding the processing of your Personal Data. The contact details of the DPA are: 28-30 Gheorghe Magheru Boulevard, District 1, Postal Code 010336, Bucharest, Romania; e-mail: anspdcp@dataprotection.ro

10.2. **How to exercise your rights**

Certain rights can be exercised directly on our App, by accessing the *Profile* menu.

In addition, to learn more about the manner in which you may exercise the aforementioned rights, please contact us at privacy@milluu.com.

Identity verification: We take utmost care of the confidentiality of all Personal Data and we reserve the right to verify your identity if you make a request in relation to your Personal Data

Fees: As a rule, you can exercise your rights free of charge. However, we reserve the right to request a reasonable fee if your claims are manifestly unfounded or excessive, in particular because of their repetitive nature.

Response Time: We make every effort to respond to your request within one month of receiving the request. This period may be extended by two further months where necessary, taking into account the complexity and number of the requests, in which case we will inform you of any such extension and of the reasons for the delay

11. CONTACT

If you have any questions or concerns about this Policy or its implementation, you may contact us at privacy@milluu.com.