

REGULATION OF THE "IMPACT SMART" LOYALTY PROGRAM

Loyalty Program for Buyers and Potential Buyers

Of IMPACT Developer & Contractor SA

FREE subscription with many benefits

SECTION 1. THE ORGANIZER AND THE OFFICIAL REGULATION

THE PROGRAM is organized by:

IMPACT DEVELOPER & CONTRACTOR S.A. with registered office in 172 – 176 Buharest – Ploiesti Road, Bucharest, District 1, Willbrook Platinum Business & Convention Center, Building A, 1st Floor, CIF RO 1553483 registered with The Trade Registry Office under no. J40/7228/2018, account RO82BTRL05001202G09193XX open at Transilvania Bank – Otopeni branch.

Participants in this loyalty program are required to comply with the terms and conditions of the Official Program Regulation as set out below (hereinafter referred to as the "Official Regulation").

The Participation/Deployment Regulation is available free of charge to any applicant, on the program's website www.greenfieldresidence.ro/smart as well as at the Organizer's address.

SECTION 2. DURATION, TEST AND LOCATION OF THE PROGRAM

2.1. The program is running for an indefinite period.

2.2. IMPACT has the right to discontinue the Program at any time, a decision that will be communicated to participants at least 15 days before the interruption date, and the announcement will be displayed on the Program's online page.

2.3. During the course of the Program, the Organizer has the right to change its content. The amendment of the Program will be the subject of an Additional Act and will be made known to IMPACT SMART beneficiaries through the Program's page. The changes will have effects for the future.

2.4. The IMPACT SMART Program is organized at the headquarters of IMPACT Developer & Contractor S.A., located in Willbrook Platinum Business & Convention Center, Building A, 1st Floor, 172 - 176 Bucharest – Ploiesti Road, Bucharest, District 1 and is conducted online on the website of the Greenfield Băneasa project www.greenfieldresidence.ro, including the apartamente.greenfieldresidence.ro subdomain.

SECTION 3. TERMS. DEFINITIONS

- 3.1. The "IMPACT SMART" Program / "The Program" – is a benefits package created by IMPACT and addressed to IMPACT SMART Subscribers.
- 3.2. Subscriber of the "IMPACT SMART" Program - any natural person over the age of 18 or legal person who enrolls the Program by filling in and checking all the fields in the application form (Name, Phone, Email, I sign up for the IMPACT SMART program and wish to receive the SMART offer, I have read and agree to [the terms and conditions](#)) and confirm the registration by accessing the link received by email. Subscription to the IMPACT SMART program is free of charge.
Through the Loyalty Program, IMPACT Developer & Contractor SA rewards its buyers and potential buyers by offering the following levels:
 - SMART STANDARD Level – any Program Subscriber has the SMART STANDARD Level with the benefits included in this level as described in Article 4.4 of this Regulation
 - SMART PREMIUM level – any subscriber of the Program who is or becomes an IMPACT Buyer
- 3.3. IMPACT SMART Card - is a card issued by IMPACT and will be used by the Premium level Impact SMART Program Beneficiary, to benefit from the facilities of the IMPACT SMART PREMIUM program.
- 3.4. IMPACT Buyer - is any natural person who is over 18 years of age or any legal representative of a legal person who has signed a sale-purchase agreement with Impact Developer & Contractor S.A. for an apartment in the Greenfield Băneasa project, located in District 1, Bucharest.
- 3.5. The benefits included in the IMPACT SMART Program are detailed in Article 4.4 of this Regulation and will be generically called Services.
- 3.6. The IMPACT SMART Program's web page is <https://greenfieldresidence.ro/smart/>

SECTION 4. PARTICIPANTS

- 4.1. This Program may be attended by any natural person over the age of 18 or legal person who signs up for the Program by filling in and checking all the fields in the application form (Name, Phone, Email, Message, I sign up for the IMPACT SMART program and wish to receive the SMART offer, I have read and agree to [the terms and conditions](#)) and confirm the registration by accessing the link received by email.
- 4.2. IMPACT SMART subscribers are required to comply with the terms and conditions of this Regulation.
- 4.3. The right to benefit from the Services detailed in this Program is valid from the activation of the Program.
- 4.4. The services included in the Program are the following:
 - 4.4.1. The service category "SMART APARTMENTS" means that the program's subscribers will be informed by email about the launch of new projects or phases, information of public interest about the company and its projects, about exclusive SMART prices. SMART

prices for apartments have a limited term of validity, which will be communicated in all information on this topic, both by email and on the project's website (<https://www.greenfieldresidence.ro/smart/>) and will be valid within the limits of available stocks.

4.4.2. The service category "SMART EVENTS" means that program subscribers will receive invitations to participate at the events that IMPACT DEVELOPER & CONTRACTOR SA organizes or the sporting events it support. Free invitations are limited. The conditions for accessing the invitations will be presented in the information dedicated to each event.

4.4.3. The services category "SMART PARTNERS" is addressed exclusively to IMPACT SMART PREMIUM subscribers (IMPACT customers who have signed up for the Program). Thus, SMART PREMIUM subscribers will be able to benefit from preferential prices, discounts, promotions to PARTNERS of IMPACT DEVELOPER & CONTRACTOR SA in various fields of activity (manufacturers or furniture stores, home appliances, notaries, banks, etc.). The list of Partners included in the Program will be constantly updated and improved so that SMART PREMIUM subscribers benefit from as many advantages as possible, and is available on the Program's website.

4.5. Services may change during certain campaigns or in other situations (e.g. public holidays, strikes, force majeure, natural disasters, state of emergency, etc.).

4.6. The services included in the Program may be modified by the Organizer and the change will be made known to IMPACT SMART Customers via the Program's website. The changes will have effects for the future.

SECTION 5. PERSONAL DATA PROCESSING

IMPACT Developer & Contractor S.A., with registered office in 172 – 176 Buharest – Ploiesti Road, Bucharest, District 1, Willbrook Platinum Business & Convention Center, Building A, 1st Floor, registered with The Trade Registry Office under no. J40/7228/2018, fiscal code RO 1553483 („IMPACT”) as Operator informs you of the conditions for processing your data in the context of your registration in the SMART Program.

5.1. The registration process

To participate in the IMPACT SMART Program you must register only once.

You can do this by filling in the Program's electronic application form with name, phone, email, message and checking the boxes "I sign up for the IMPACT SMART Program and I want to receive the SMART offer" and "I have read and agree to terms and conditions". After pressing the Send button, you will receive your SMART code and a link by email to confirm your email address.

After confirming your email address, you will receive an invitation to complete a short questionnaire so we can customize the information we will send you. This means that you will fill in the following personal data about yourself: locality, county, year of birth, number of children <3 years of age; between 3 – 6, 7 – 10, 11 – 18, over 18, current occupation, field of activity, purpose of information (housing, investment, curiosity).

5.2. General conditions for the processing of personal data – purpose and basis

Your data will be collected through the application form on www.greenfieldresidence.ro.

In order to enroll and participate in the Program, IMPACT SA will process your first and last name, phone number and email address so we can contact you about offers and events. To the extent that you give us your consent, we will also process information about your locality, the county, the year of birth, the number of your children and their age, the purpose of the information, the current occupation, the scope of the activity for the purpose of personalizing our offers and communications.

Your data are processed pursuant to Article 6 (1) (a) GDPR – the processing is carried out with your consent.

We may also process the data provided for the purpose of improving the Program, as well as for statistical analysis purposes, on the basis of the legitimate interest of IMPACT SA – Article 6(1) (f) GDPR.

The personal data of the Participants in the Program will be retained by IMPACT SA until a contrary manifestation of will.

By signing up for the IMPACT SMART Program, you agree that we will send you personalized offers, event invitations and offers from our partners to IMPACT SMART Premium customers. Personalized offers will be submitted following analysis of the data entered by you. For example, if we organize an event on Child's day for children up to 10 years, you will receive an invitation about this event, only if you have filled in the form your child's age.

This program is a continuation of the Genius Program, started on 15.10.2020.

Genius beneficiaries have continuity in the new program, all their benefits being recognized.

5.3. Data recipients

Your personal data will be stored on our servers. If we appeal to processors, we will conclude an agreement with them within the meaning of Article 28 of the GDPR to ensure appropriate security measures and the transfer of security to them.

5.4. Rights of Program participants as data subjects

In accordance with Article 15 (1) of RGPD, you have the right to obtain free of charge, upon request, information about your personal data stored by IMPACT SA.

The right to modify (Article 16 of the RGPD), to delete (Article 17 of the RGPD) and to limit (article 18 of the RGPD) the processing of personal data.

At the extent the processing of the data is based on Article 6 (1) letter (e) or (f) of RGPD, you have at your disposal a right of opposition in accordance with Article 21 of the RGPD.

If you oppose data processing, this will be no longer valid in the future, unless the controller demonstrates that his legitimate interest prevails over the interests, rights and freedoms of the data subject.

If you consent to the processing of data, you have a data portability right in accordance with Article 20 of the RGPD.

If the processing of the data is based on consent, in accordance with Article 6(1) of (a) or Article 9 (2) of the RGPD, it may be revoked at any time, with effect in the future, without affecting the legality of the previous processing.

In addition, you have the right to file complaints with the National Supervisory Authority for Personal Data Processing.

If there are any questions or if you wish to exercise a right, please contact us in writing or by e-mail, in attention of the Data Protection Officer by sending an email, to: dpo@IMPACTsa.ro or a written request to: Willbrook Platinum Business & Convention Center, Building A, 1st Floor, IMPACT Developer & Contractor SA, in attention of the Data Protection Officer.

Program participants can also file a complaint with the ANSPDCP by visiting the website: <http://www.dataprotection.ro>.

More details about the Privacy Policy and participants' rights are at: <https://www.https://www.greenfieldresidence.ro/privacy-policy/>.

SECTION 6. FINAL DISPOSITIONS

6.1. By participating in this program, participants declare that they agree to respect and comply with all the provisions, terms and conditions of this Regulation.

6.2. Organizers shall reserve the right to amend this Regulation during the duration of the program without prior notice.

6.3. Organizers reserve the right to permanently exclude any Participant in the Program who, through fraudulent behaviour, puts the Program out of gear.

6.4. Any disagreements between the Organizer and the program participants will be resolved amicably or, if this is not possible, the disputes will be resolved by the competent Romanian courts.

6.5. The Program Regulation is available on <https://www.greenfieldresidence.ro/smart/> during its whole duration.

12.02.2021