

INFORMATION NOTICE ON THE PROCESSING OF LAND-RELATED DATA

Notice addressed to persons who are not Users of the VERGO Platform

This page is addressed primarily to **owners and holders of land** in Romania. If you are a User of the Platform, the information concerning you is set out in the [Privacy Policy](#).

1. Why you are receiving this notice

VERGO HUB S.R.L. operates a platform that analyses the suitability of land for renewable energy projects and other uses. In carrying out this activity, we maintain a **reference dataset** that associates analysis results with the **geometry of the parcels** analysed.

Since a parcel can be linked to its owner through public registers, part of this information may constitute **personal data** concerning you, even though we do not hold your name.

We publish this notice in performance of the information obligation set out in **art. 14 of Regulation (EU) 2016/679 (GDPR)**, for situations where the data has not been obtained directly from the data subject. Since we do not hold owners' contact details and obtaining them would involve disproportionate effort, this information is provided by publishing this notice, pursuant to art. 14(5)(b) GDPR.

2. The controller

VERGO HUB S.R.L. · Str. Anton Pann 2, Et. P, Ap. 3, Sector 3, București, cod 030796, Romania · CUI 51956083 · Trade Register no. J2025041968001 **Contact for data protection matters:** office@vergo.ro

3. What data we process

Category	Detail
Parcel geometry	the spatial outline of the property analysed
Cadastral identifiers	cadastral number, land book number, administrative-territorial unit
Land characteristics	area, land use category, slope, exposure, distances to infrastructure, classification within protected or risk zones
Analysis result	the suitability score and the values of the criteria evaluated
Metadata	date of the analysis, at month-level granularity; version of the methodology applied

We do not process, within the reference dataset: the owners' first name, surname, personal identification number, home address, contact details, or personal legal situation.

4. Where the data comes from

- public and administrative sources concerning land, consulted under their applicable terms of use;
- results we calculate ourselves, by applying our own methodology to these sources.

We do not incorporate into the reference dataset the documents uploaded by Platform users, nor the data extracted from them.

5. Purpose and legal basis

Purpose: developing, calibrating and improving a land-suitability analysis service, as well as producing aggregated market statistics.

Legal basis: our legitimate interest, pursuant to **art. 6(1)(f) GDPR**, in developing and operating this service. We have carried out and documented a balancing assessment between this interest and the rights and freedoms of data subjects, available on request in summary form.

6. Who we share the data with

We do not sell or disclose data at the level of an individual parcel to third parties.

We publish only **aggregated statistical indicators**, at the level of an administrative-territorial unit or higher, with minimum aggregation thresholds that prevent the identification of an individual parcel.

The data may be accessed by our technical infrastructure providers, acting as processors, under the conditions described in the Privacy Policy.

7. How long we keep the data

For the duration of the operation of the reference dataset, with **a review of the need for retention at least once every 5 years**.

8. Your rights

You have the right: **of access** to data concerning you · **to rectification**, if inaccurate · **to erasure** · **to restriction of processing** · **to object** to processing based on legitimate interest.

The right to object is the most relevant in your situation: you may object at any time, on grounds relating to your particular situation, and **we will cease processing**, unless we demonstrate compelling legitimate grounds that override your interests, rights and freedoms, or the need to defend a legal claim in court.

How to exercise your rights: write to office@vergo.ro, indicating the **cadastral number or location of the parcel** concerned and how we can confirm your status as owner or holder. We respond within **one month** at the latest.

We do not ask for your personal identification number in order to identify the parcel.

Complaint: the National Supervisory Authority for Personal Data Processing (ANSPDCP) — B-dul G-ral. Gheorghe Magheru nr. 28-30, sector 1, București · dataprotection.ro. You may also address the courts.

9. Automated decisions

The analysis produces a score **concerning a plot of land**, not a person. We do not make automated decisions that produce legal effects concerning you or similarly significantly affect you.

10. Changes

The version in force, together with its update date, is permanently published at vergo.ro/legal/landowners. Previous versions remain accessible in the archive.