

INFORMATION ON THE PROCESSING OF PERSONAL DATA

Provided pursuant to Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of Personal Data and on the free movement of such data, repealing Directive 95/46/EC (General Data Protection Regulation, hereinafter referred to as the "GDPR Regulation"), and Act No. 110/2019 Coll. on the Protection of Personal Data and on Amendments and Supplements to Certain Acts (hereinafter referred to as the "Personal Data Protection Act").

Controller: **CORWIN CZ s.r.o.**
Registered office: Na Florenci 2116/15, Nové Město, 110 00 Praha 1
Company ID No.: 143 70 964
(hereinafter referred to as "CORWIN CZ" or the "Controller")

CORWIN CZ oversees the development of multiple real estate projects. More detailed information on projects carried out by CORWIN CZ or the CORWIN group is available at: <http://corwin.sk/#portfolio> (hereinafter also referred to as the "Projects").

Since you have expressed interest in being contacted for information regarding the sale/lease of office spaces, commercial premises, or residential units, employment opportunities, or investment opportunities in the Projects managed by companies within the CORWIN group in the territory of the Slovak Republic, the Czech Republic, and Slovenia, CORWIN CZ processes your Personal Data as a data subject to the following extent: a) First name and surname b) Email address c) Any other data you provide in the "What's on your mind" field, provided that such data qualify as Personal Data (Hereinafter, the data specified under points a) to c) collectively referred to as "Personal Data")

I. Identification of the Controller and contact details

The Controller, on whose behalf the Personal Data are processed, is CORWIN CZ s.r.o., with its registered office at Na Florenci 2116/15, Nové Město, 110 00 Praha 1, Company ID No.: 143 70 964, registered in the Commercial Register maintained by the Municipal Court in Prague, Section C, Insert No. 364678. Contact details: Phone: +421 2 5441 6009, +421 2 5441 6007, Fax: +421 2 5441 6011, Email: gdpr@corwin.sk.

II. Definition of processing purposes and legal basis

CORWIN CZ processes Personal Data to the extent provided by you, as the data subject, for the following purposes:

- **The purpose of recording and supporting communication in connection with the sale and/or lease of office spaces, retail units, or apartments** in Projects implemented by companies belonging to the CORWIN group. The legal basis for the processing of Personal Data is the legitimate interest of CORWIN CZ (Article 6(1)(f) of the GDPR).
- **Purpose of pre-contractual communication** in the case of a potential conclusion of a contract with the data subject regarding the sale or lease of office premises / retail units / apartments. The processing of personal data is necessary for the performance of a contract to which the data subject is a party and/or to take steps necessary prior to entering into a contract, including negotiation of contractual terms, preparation, communication, and subsequent conclusion of the relevant agreements. The legal basis for processing Personal Data necessary for the performance of the contract is fulfilment of the contract (Article 6(1)(b) of the GDPR Regulation).
- **Purpose of contacting data subjects** as potential prospects or clients who reach out to CORWIN CZ via a contact form expressing interest in meetings or communication related to their interest in CORWIN Group projects, housing, office, or retail spaces. The legal basis for the processing of Personal Data is the legitimate interest of CORWIN CZ (Article 6(1)(f) of the GDPR).
- **Statistical purposes** – the combination of Personal Data with data from other clients for the purpose of creating reports that help improve the services provided by CORWIN CZ, while maintaining technical and organizational measures to ensure the principle of data minimization. The legal basis for processing Personal Data is further processing of Personal Data (Article 5(1)(b) in conjunction with Article 89(1) of the GDPR Regulation) – the result of such processing will never be Personal Data, but rather aggregated/anonymized information (e.g., the number of customers or economic statistics).
- **Purpose of establishing, exercising, and defending legal claims.** The legal basis for processing Personal Data is the legitimate interest of CORWIN CZ (Article 6(1)(f) of the GDPR Regulation).
- **The purpose of maintaining a record of requests from data subjects and their processing by CORWIN CZ.** The legal basis for processing Personal Data is the legitimate interest of CORWIN CZ (Article 6(1)(f) of the GDPR Regulation).
- **Purpose of fulfilling the obligations of CORWIN CZ** under applicable legal regulations, such as tax obligations, consumer protection duties within the internal market, or obligations arising from laws related to the prevention of money laundering and terrorist financing, in particular pursuant to Act No. 253/2008 Coll., on Certain Measures against the

Legalization of Proceeds of Crime and Financing of Terrorism and on Amendments to Certain Acts, as amended. The legal basis for the processing of Personal Data is the fulfillment of legal obligations (Article 6(1)(c) of the GDPR).

III. Categories of Data Subjects

CORWIN CZ processes Personal Data for the purposes specified in Article II concerning clients, potential clients, job applicants to CORWIN CZ or other companies within the CORWIN group, or individuals interested in investing. These data subjects are those whom CORWIN CZ has identified as having expressed interest via the contact form for a meeting or communication regarding their interest in investment, housing, office spaces/commercial premises (retail), or employment opportunities at CORWIN CZ or within companies in the CORWIN group.

IV. Legitimate interests pursued by CORWIN CZ

The legitimate interest of CORWIN CZ lies in the opportunity to familiarize clients, potential clients, job applicants to CORWIN CZ or companies within the CORWIN group, or investors, with offers related to Projects, job opportunities, or investment prospects. In this case, the data subject voluntarily provides their Personal Data because they request information/services from the Controller that they are interested in. The Controller, in the course of its business activities, does not undertake any independent actions to obtain the Personal Data of the data subject. Instead, the data subject independently contacts the Controller to obtain additional information regarding the purchase and/or rental of office spaces, commercial properties, apartments, investment offers, or job opportunities within the Controller's current offerings. The Controller does not actively seek any information but only responds to the data subject's request, and if necessary, develops communication regarding the specific request. This is essential for the implementation of its core business activities, including its role as an employer. Without processing the aforementioned Personal Data (voluntarily provided by the data subject) for the purposes of recordkeeping and supporting communication in the sale and rental of office spaces, commercial properties, apartments, or investment or job opportunities, the Controller would not be able to accept and record the data subject's requests and respond accordingly. This would significantly limit its ability to sell or rent properties, which is not in its interest, nor to receive interesting offers from potential investors or attract qualified individuals, which is crucial for the proper execution of its core business activities and operations. The legitimate interest of CORWIN CZ also includes demonstrating, asserting, and defending the company's legal claims that may arise from potential legal relationships (e.g., lease, sale) between the Controller and the data subject. Within these relationships, there may be a need to utilize the data and information that the data subject provided to CORWIN CZ in the course of pre-contractual communications and the negotiation of specific terms of the contractual relationship, for the purposes of proving, asserting, or defending rights. The legal basis for processing Personal Data for the purposes described in Section II is the legitimate interest of CORWIN CZ, as provided in the relevant article of the GDPR and the applicable provision of the Data Protection Act, provided that in such cases, the legitimate interest of CORWIN CZ does not outweigh the interests, fundamental rights, and freedoms of the data subject that require the protection of personal data.

Right of the Data Subject to object to the processing of Personal Data

The data subject has the right to object at any time, on grounds related to their specific situation, to the processing of Personal Data concerning them, which is carried out based on the legal basis of legitimate interest of the Controller – CORWIN CZ. The Controller, CORWIN CZ, must no longer process the Personal Data unless it demonstrates that there are compelling legitimate grounds for the processing which override the interests, rights, and freedoms of the data subject, or for the establishment, exercise, or defence of legal claims.

V. Information on the voluntariness or obligation to provide personal data

In the case that the data subject wishes to be contacted by CORWIN CZ for the purpose of arranging a meeting and presenting the available options for residential spaces/office spaces/commercial premises in CORWIN CZ projects, investment opportunities, or job offers, and for related communication and potential contract for the purchase/rental of office spaces/commercial premises/apartments, the data subject is required to provide CORWIN CZ, as the Controller, with their Personal Data (at least first name, last name, and email address) for further communication. Otherwise, CORWIN CZ will not be able to contact the data subject, and the data subject will not receive the requested information regarding the offer of commercial spaces/office premises/job offers/investment opportunities. Whether the data subject decides to provide their Personal Data for the purpose of arranging a meeting or other communication regarding commercial spaces/office premises/apartments/job offers/investment opportunities is their voluntary decision, and the failure to provide such data should not have any significant consequences for the data subject.

VI. Recipients or categories of recipients of Personal Data

It is anticipated that the Personal Data processed on behalf of CORWIN CZ for the purposes outlined in Article II will also be provided to the following recipients:

- a) Processors who have been duly authorized in writing by the Data Controller to process personal data. This includes, in particular, providers of IT services and other entities whose services are used in the course of our operations. We carefully select processors to ensure compliance with all data protection

requirements.

b) Authorized employees of CORWIN CZ.

c) Authorized entities within the CORWIN group who may enter into contractual relationships with the data subject. These entities will become recipients upon engaging in negotiations regarding the relevant investment opportunities. (Hereinafter referred to as the "recipients").

VII. Retention period of Personal Data

Personal Data processed for the purposes of recording and supporting communication regarding the sale and rental of office space/retail properties/apartments, investment opportunities, or job offers will be processed for as long as the communication concerning the interest of the client or potential client/party in the spaces within CORWIN Group projects, or job positions or opportunities to invest in CORWIN Group projects, is ongoing, as well as for the duration of any communication related to negotiations for contract conclusion, and any accompanying communication. In the case of the conclusion of a relevant contract (e.g., lease, purchase, etc.), these data will be retained in connection with the execution of the transaction for at least the duration required by the applicable legal regulations for asserting and/or defending rights arising from the contract relationship. Personal Data processed for the purpose of proving, asserting, and defending legal claims of data subjects will be processed for at least the duration required by the applicable legal regulations or for the duration of the Operator's rights and claims, particularly for the duration of the statutory limitation periods set by legal regulations, typically for up to 10 years after the termination of the contractual relationship (if one exists), or until the resolution of disputes and other proceedings related to the Operator's claims or the defence of the Operator's rights. Personal Data processed for the purpose of fulfilling CORWIN CZ's obligations will be processed for as long as CORWIN CZ is required to fulfil its obligations under applicable legal regulations (such as regulations on accounting, archiving, consumer protection), the fulfilment of which also requires the processing of personal data. Personal Data processed for statistical purposes will be processed for the duration of the retention periods for the other purposes mentioned above.

VIII. Information Regarding Automated Individual Decision-Making

CORWIN CZ does not use any methods of automated individual decision-making, including profiling, when processing personal data.

IX. Information regarding the rights of clients and potential clients

In accordance with the conditions established by data protection regulations, you, as the data subject, have the following rights:

o **Right to request access to Personal Data that concerns you from the Controller:**

The data subject has the right to obtain confirmation from CORWIN CZ as to whether Personal Data concerning them is being processed, and if so, the right to access such Personal Data and the following information: the purposes of processing; categories of Personal Data concerned; recipients or categories of recipients to whom the Personal Data have been or will be disclosed, especially recipients in third countries or international organizations; where possible, the anticipated period for which the Personal Data will be stored, or, if not possible, the criteria used to determine that period; the existence of the right to request from the Controller the correction of Personal Data concerning the data subject, or their deletion, or restriction of processing, or the right to object to such processing; the right to lodge a complaint with a supervisory authority; if the Personal Data were not obtained from the data subject, any available information as to their source; the existence of automated decision-making, including profiling, referred to in Articles 22(1) and 22(4) of the GDPR, and, in these cases, at least meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject. CORWIN CZ will provide a copy of the Personal Data being processed. For any additional copies requested by the data subject, a reasonable fee may be charged to cover the administrative costs of processing the request.

o **Right to rectification of personal data:**

The data subject has the right to have CORWIN CZ rectify any inaccurate Personal Data concerning them without undue delay. In relation to the purposes of processing, the data subject has the right to complete incomplete personal data, including by providing a supplementary statement.

o **Right to erasure (right to be forgotten):**

The data subject also has the right to request that CORWIN CZ erase Personal Data concerning them without undue delay, and CORWIN CZ is obliged to erase Personal Data without undue delay if one of the following grounds applies:

- the Personal Data are no longer necessary for the purposes for which they were collected or otherwise processed;
- the data subject withdraws the consent on which the processing is based, according to Article 6(1)(a) or Article 9(2)(a) of the GDPR, and there is no other legal basis for the processing;
- the data subject objects to the processing under Article 21(1) of the GDPR and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing under Article 21(2) of the GDPR;
- the Personal Data have been unlawfully processed;
- the Personal Data must be erased to comply with a legal obligation under Union or Member State law to which the Controller is subject;

- the Personal Data were collected in relation to the offer of information society services under Article 8(1) of the GDPR.

If CORWIN CZ has made the Personal Data public and is required to erase the personal data, it will take reasonable steps, including technical measures, to inform Controllers processing the Personal Data that the data subject has requested the erasure of all links to, copies of, or replicas of those personal data, considering the available technology and the cost of implementation.

o **Right to erasure does not apply where processing is necessary:**

- for the exercise of the right to freedom of expression and information;
- for the fulfilment of a legal obligation which requires processing under Union or Member State law to which the Controller is subject, or for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Controller;
- for reasons of public interest in the area of public health in accordance with Article 9(2)(h) and (i), as well as Article 9(3) of the GDPR;
- for archiving purposes in the public interest, scientific or historical research purposes, or statistical purposes in accordance with Article 89(1) of the GDPR, if it is likely that the right mentioned above will prevent or seriously hinder the achievement of the objectives of such processing; or
- for the establishment, exercise, or defence of legal claims.

o **Right to restrict processing:**

The data subject has the right to obtain from the Controller the restriction of processing in any of the following cases:

- the data subject contests the accuracy of the personal data, for a period enabling the Controller to verify the accuracy of the personal data;
- the processing is unlawful, and the data subject objects to the erasure of the Personal Data and requests the restriction of their use instead;
- the Controller no longer needs the Personal Data for the purposes of processing, but the data subject requires them for the establishment, exercise, or defence of legal claims;
- the data subject has objected to the processing under Article 21(1) of the GDPR, pending verification of whether the legitimate grounds of the Controller override the legitimate grounds of the data subject.

If processing has been restricted as described above, such Personal Data shall, except for storage, only be processed with the consent of the data subject or for the establishment, exercise, or defence of legal claims, or for the protection of the rights of another natural or legal person, or for reasons of substantial public interest of the Union or of a Member State. The data subject, who has obtained the restriction of processing in accordance with the above, will be informed by CORWIN CZ before the restriction is lifted.

o **Right to data portability:**

The data subject has the right to receive the Personal Data concerning them and which they have provided, in a structured, commonly used, and machine-readable format, and has the right to transmit those data to another Controller without hindrance from the Controller to whom the Personal Data were provided, if:

- the processing is based on consent under Article 6(1)(a) or Article 9(2)(a) of the GDPR, or on a contract under Article 6(1)(b) of the GDPR, and
- the processing is carried out by automated means.

The data subject, when exercising their right to data portability, has the right to have their Personal Data transferred directly from one Controller to another, where technically feasible. The exercise of this right does not affect Article 17 of the GDPR. This right does not apply to processing necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Controller. The right to data portability must not adversely affect the rights of others.

o **Right to object to processing, including objection to profiling (if carried out):**

The data subject has the right to object at any time, on grounds related to their particular situation, to the processing of Personal Data concerning them, which is carried out based on Article 6(1)(e) or (f) of the GDPR, including objecting to profiling based on those provisions. The Controller must no longer process the Personal Data unless they demonstrate compelling legitimate grounds for the processing which override the interests, rights, and freedoms of the data subject, or for the establishment, exercise, or defence of legal claims. If the Personal Data is processed for direct marketing purposes, the data subject has the right to object at any time to the processing of Personal Data concerning them for such marketing purposes, including profiling to the extent that it is related to such direct marketing. If the data subject objects to processing for direct marketing purposes, the Personal Data must no longer be processed for those purposes.

o **Right to file a complaint with a supervisory authority:**

The supervisory authority to which the data subject addresses their complaint, in justified cases, is the Office for Personal Data Protection of the Czech Republic. Right to withdraw consent for processing (if Personal Data is processed based on consent):

In cases where the legal basis for processing Personal Data is the consent of the data

subject, the data subject has the right to withdraw their consent at any time without the Personal Data Protection Act affecting the lawfulness of processing based on consent before its withdrawal.

The data subject may exercise the right to withdraw consent at any time, even before CORWIN CZ is obliged to provide the data subject with information about the measures taken based on their request under the Personal Data Protection Act within one month of receiving the data subject's request. This period may be extended by CORWIN CZ for up to two additional months, taking into account the complexity, difficulty, and number of requests, even repeatedly. However, CORWIN CZ must inform the data subject about each such extension within one month of receiving the request, along with the reasons for the extension. If CORWIN CZ takes no action based on the data subject's request, they must inform the data subject of the reasons for non-action and the possibility of filing a complaint with the Office for Personal Data Protection of the Czech Republic under the Personal Data Protection Act.

methods:

- a) by mail to the registered office of CORWIN CZ;
- b) by email to CORWIN CZ;
- c) by phone;
- d) at any time and free of charge by clicking the relevant link found in every delivered newsletter.

CORWIN CZ is obliged to take appropriate measures and provide the data subject with information according to the Personal Data Protection Act and notifications The Controller does not intend to transfer Personal Data to third countries outside the EU.

according to the Personal Data Protection Act regarding the processing of their personal data, in a concise, transparent, understandable, and easily accessible form.

CORWIN CZ provides assistance to the data subject in exercising their rights under