

Information on the Rights of the Data Subject

according to Act no. 18/2018 Coll. on the protection of personal data and on the amendment of certain laws (hereinafter referred to as the "Law") and pursuant to Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 2016 on the protection of natural persons in the processing of personal data and on the free movement of such data, which repeals Directive 95/46/EC (general regulations on the protection of personal data) (hereinafter referred to as the "Regulation")

I.

Right to information (§ 19 of the Act; 13 of the Regulation)

In order to fulfill the operator's information obligation, which corresponds to the data subject's right to information, the operator, in accordance with the provisions of § 19 of the Act and Art. 13 of the Regulation provides the following information to the person concerned:

1. The purpose of processing the personal data of the person concerned by the operator:

a. Preparation of documents for the realization of a real estate transaction - conclusion of the Purchase Agreement, Lease Agreement, Brokerage Agreement, Agreement on depositing a deposit, preparation of the Transfer Protocol, Proposal for a deposit, etc. In particular, the preparation of the conclusion of the relevant contract or other of the mentioned documents, the registration of the contract and related documents, including all their changes in the internal system of the operator, the fulfillment of the subject of the contract and the control of its fulfillment by the person concerned, the handling of claims and complaints, the recovery of claims arising in connection with the non-fulfillment of the contract. The legal basis is the provision of Art. 6 par. 1 letter b) Regulations, i.e. fulfillment of the relevant contract.

b. Preparation of the Inspection Record - processing of personal data of the person concerned, which in this case is a potential buyer, or tenant, for the purpose of confirming that the given property was presented to him through our company and also for the purpose of including this client in the company database of clients looking for a suitable property. The legal basis is the provision of Art. 6 par. 1 letter f) Regulations, i.e. j. legitimate interest of the operator. Our legitimate interest in this case is the proper and undisturbed performance of our business activity,



which we would not be able to carry out if you, regarding the purchase or lease of the property, they communicated with the owner without our participation, despite the fact that the property in question was presented to you by our company and the provision of Art. 6 par. 1 letter a) Regulations, i.e. consent of the person concerned.

c. Implementation of advertising through Internet real estate portals in real estate CRM software - implementation of advertising through Internet real estate portals in the form of offering real estate for the purpose of selling or lease to a third party. In the relevant real estate CRM software, the personal data of the person concerned as the owner of the property are also provided for the individual properties for the sake of easier identification for the operator, but they are not visible to third parties. The legal basis is the consent of the affected person (property owner) to the processing of personal data according to Art. 6 par. 1 letter a) Regulations.

d. Bookkeeping and preparation of accounting documents - especially management and invoicing of services provided on the basis of contracts, processing of accounting, tax documents and invoices. The legal basis is the provision of Art. 6 par. 1 letter c) Regulations, i.e. fulfillment of obligations according to special regulations, especially Act no. 431/2002 Coll. on accounting as amended.

e. Registry administration / Record of received and sent mail - processing of personal data of the affected person by the operator for the purpose of ensuring registry administration - registration and archiving of contracts, accounting, tax and related documents in the operator's internal systems. Record of incoming and outgoing mail, record of electronic mail. The legal basis is the provision of Art. 6 par. 1 letter c) Regulations, i.e. j. fulfillment of our legal obligation according to special regulations, in particular according to the Accounting Act and Act no. 395/2002 Coll. on archives and registries and on amendments to certain laws.

f. Advertising and marketing of the operator's services and products - especially sending informational newsletters about our products and services and the current offer of real estate, etc. The legal basis is the provision of Art. 6 para. 1 letter a) Regulations, i.e. the consent of the person concerned.

g. Affected persons – processing of personal data of the affected person by the operator applying the right according to the Regulation for the purpose of

processing them (request). The processing concerns ordinary personal data. It concerns the person concerned who exercises his rights under the Regulation. The legal basis is the fulfillment of legal obligations by the operator in accordance with EU legislation (Regulation 679/2016) and Act No. 18/2018 Coll. on the protection of personal data) according to Article 6 paragraph 1 letter c) Regulations.

2. We will keep your personal data for the time necessary to fulfill the defined purposes of personal data processing, but at the most for the duration of the relevant contract, or settlement of mutual obligations resulting from it. We store invoices as well as other tax and accounting documents in accordance with the relevant legal regulations for a period of 10 years after the year to which they relate. We keep personal data processed for advertising and marketing purposes for a period of 10 years from their provision. After this period, your personal data will be deleted. If at any time during the duration of the contractual relationship you object to the processing of your personal data for direct marketing of our services and products, we will stop processing your personal data for this purpose.

3. We absolutely need your personal data from you, because if they are not provided, a contractual relationship between you and our company cannot be established, as they are an essential part of the contracts concluded between you and our company in accordance with Act. no. 40/1964 Coll. Civil Code as amended and Act. no. 513/1991 Coll. Commercial Code as amended. As a result of this fact, we could not provide you with the real estate services offered by us. However, if you decide not to provide us with your phone number or e-mail address, this does not prevent the creation of a contractual relationship or the provision of real estate services, but our mutual communication will not be as effective as if you had provided them to us.

4. All your personal data will be stored in our internal systems and will be further provided by us to various cooperating entities (intermediaries), which are mainly those interested in selling/purchasing/renting real estate, auditors, legal advisors, notaries, experts and appraisers of the value of real estate, tax, accounting and financial intermediaries, banks, insurance companies, persons performing advertising and marketing activities for the operator, for the purpose of advertising and also operators of internet real estate portals in real estate CRM software, to the extent that is absolutely necessary for the performance of their work or rights, and who, at the same time, in relation to the information provided or made available, will have, to the extent and under the conditions agreed in the written contract that we conclude with them or established by generally binding legal regulations, the obligation to keep such information confidential.

5. If we process your personal data also based on consent, you have the right to withdraw this consent to the processing of personal data at any time. Withdrawal of consent does not affect the lawfulness of personal data processing based on consent prior to its withdrawal. You can revoke the granted consent in the same way as the consent was granted, i.e. in writing.

II.

Other rights of the Data subject

1. Right of access to personal data (Article 15 of the Regulation)

The person concerned has the right to access his data. Based on the request of the person concerned, the operator will issue a confirmation on whether the personal data of the person concerned are being processed. If the operator processes this data, it will issue a copy of this personal data to the person concerned upon request. If a person requests information in the form of electronic means, it will be provided to him in a commonly used electronic form, namely by e-mail, unless he requests another method.

2. The right to correct personal data (Article 16 of the Regulation)

The affected person has the right to correct personal data if the operator records incorrect personal data about him. At the same time, the person concerned has the right to supplement incomplete personal data.

3. The right to erasure of personal data (the right "to be forgotten") (Article 17 of the Regulation)

The person concerned has the right to delete personal data without undue delay after exercising this right in the event of:

- a. personal data are no longer necessary for the purposes for which they were obtained or otherwise processed;
- b. the person concerned revokes the consent on the basis of which the processing is carried out,
- c. the person concerned objects to the processing of personal data (Article 21(1) of the Regulation)
- d. personal data were processed illegally,
- e. the reason for erasure is the fulfillment of the obligation of the law, special regulation or international treaty to which the Slovak Republic is bound, or
- f. personal data was obtained in connection with the offer of information society services to a person under the age of 16.

The affected person will not have the right to delete personal data, provided that their processing is necessary:

- a. to exercise the right to freedom of expression and information;

- b. to fulfill an obligation according to the law, a special regulation or an international treaty to which the Slovak Republic is bound, or to fulfill a task carried out in the public interest or in the exercise of public authority entrusted to the operator;
- c. for reasons of public interest in the field of public health;
- d. for the purposes of archiving in the public interest or statistical purposes, if it is likely that the right to erasure will make it impossible or seriously difficult to achieve the goals of such processing;
- e. to demonstrate, exercise or defend legal claims.

4. The right to limit the processing of personal data (Article 18 of the Regulation)

The person concerned has the right to limit the processing of personal data, if:

- a. challenges the correctness of personal data with an objection (Article 21 paragraph 1 of the Regulation), during the period allowing the operator to verify the correctness of personal data;
- b. processing is illegal and the affected person requests restriction of their use instead of erasure of personal data;
- c. the operator no longer needs the personal data for processing purposes, but the data subject needs them to prove, exercise or defend legal claims;
- d. the affected person objected to the processing of personal data on the basis of the legitimate claim of the operator, until it is verified whether the legitimate reasons on the part of the operator prevail over the legitimate reasons of the affected person.

If the data subject requests the restriction of the processing of his personal data, the operator will not carry out any processing operations with the data concerned, except storage, without the consent of the data subject.

The affected person will be informed by the operator if the restriction on the processing of this data is lifted.

5. The right to portability of personal data (Article 20 of the Regulation)

The person concerned has the right to data portability, which means obtaining the personal data that he has provided to the operator, while he has the right to transfer this data to another operator in a commonly used and machine-readable format, provided that the personal data was obtained on the basis of consent or on the basis of a contract to which you are a party.

6. The right to object to the processing of personal data (Article 21 of the Regulation)

The person concerned has the right to object at any time to the processing of his personal data on the basis of:

- a. the legal title of the performance of tasks carried out in the public interest or in the exercise of public authority, or from the legal title of the legitimate interest of the operator,

- b. processing personal data for direct marketing purposes,

- c. processing for statistical purposes.

If the person concerned objects to the processing of personal data for the purposes of direct marketing according to point 6. letter b), her personal data cannot be further processed by the operator.

The operator may not continue to process personal data if he does not demonstrate the necessary legitimate interests for processing personal data that outweigh the rights or interests of the person concerned, or grounds for asserting a legal claim.

7. The right to ineffectiveness of automated individual decision-making, including profiling (Article 22 of the Regulation)

When processing your personal data on our part, there is no automated decision-making or profiling.

8. The right to submit a proposal to initiate proceedings on the protection of personal data (§ 100 of the Act; Articles 77 and 79 of the Regulation)

If you believe that the processing of your personal data is contrary to the law and the Regulation, you have the right to submit a request to the Office for the Protection of Personal Data, with headquarters at Hraničná 12, 820 07 Bratislava, Slovak Republic, ID: 36 064 220 (hereinafter referred to as the "Office") or to another competent authority, especially in the Member State of your habitual residence, place of work or the place of the alleged violation. initiation of personal data protection proceedings.

The motion to initiate proceedings (hereinafter referred to as the "motion") must contain:

- a. name, surname, mailing address and signature of the applicant,
- b. indication of the person against whom the proposal is directed, indicating the name, surname, permanent residence or title, seat and identification number, if assigned,
- c. the subject of the proposal, indicating the rights that should have been violated during the processing of personal data,
- d. evidence to support the claims made in the proposal,
- e. a copy of the document or other evidence proving the exercise of the right according to the second part of the second chapter of this Act or the Regulation, if the person concerned has exercised such a right, or a statement of reasons worthy of special consideration for the non-application of the right in question, if the proposal was submitted by the person concerned.

The sample proposal for initiating proceedings before the Office is published on the Office's website.

Without prejudice to your right to seek protection of your rights based on a proposal to initiate proceedings before the Office, you also have the right to seek your rights in the substantively and locally competent court of the Slovak Republic, if you believe that as a result of the processing of your personal data in violation of the

Regulation, your rights established in the Regulation have been violated.

This document enters into force on 24 december 2021