

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").

Controller: **CORWIN SK a.s.**
Registered office: Námestie Mateja Korvína 1, 811 07 Bratislava
Company ID No.: 45 500 126
(hereinafter referred to as "CORWIN SK" or the "Controller")

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

Since you have expressed interest in receiving marketing offers from CORWIN SK a.s. via direct mail, newsletters, targeted offers, or other appropriate forms of communication regarding updates and current information on offers related to our Projects and other activities carried out by CORWIN SK a.s. and companies within the CORWIN group in the territory of the Slovak Republic, the Czech Republic, and Slovenia, CORWIN SK a.s. processes your Personal Data as a data subject to the following extent: a) Email address (hereinafter also 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 SK a.s., with its registered office at Námestie Mateja Korvína 1, 811 07 Bratislava – Staré Mesto, Company ID No.: 45 500 126, registered in the Commercial Register of the Municipal Court Bratislava III, Section: Sa, Insert No. 5015/B. Contact details: Phone: +421 2 5441 6009, +421 2 5441 6007, Fax: +421 2 5441 6011, Email: gdpr@corwin.sk. You may also reach out to the designated Data Protection Representative at dpo@corwin.sk.

II. Definition of processing purposes and legal basis

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

- **The purpose of direct marketing**, to inform data subjects about updates related to individual Projects carried out by CORWIN SK a.s., or the CORWIN group, and to reach out to data subjects with further marketing offers from CORWIN SK a.s. via direct mail, newsletters, targeted offers, or other appropriate forms of communication. The legal basis for processing Personal Data is consent, provided that the data subject supplies their email address and expresses consent to the processing of their Personal Data for the purpose of receiving commercial and marketing information from CORWIN SK a.s.
- **The purpose of statistical analysis, for the purpose of combining Personal Data** with data from other clients to create reports that help improve the services provided by CORWIN SK, while ensuring the implementation of technical and organizational measures to comply with the data minimization principle. 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).

III. Categories of data subjects

CORWIN SK a.s. processes Personal Data for the purposes specified in Article II concerning interested parties as data subjects, whom CORWIN SK a.s. has identified as having expressed interest in receiving updates about real estate offerings within Projects, as well as news related to the activities of CORWIN SK a.s. or the CORWIN group.

Right of the data subject to object to the processing of Personal Data

The data subject has the right to object to the processing of their Personal Data for direct marketing purposes. If the data subject objects to the processing for direct marketing purposes, their Personal Data must no longer be processed for such purposes.

IV. Information on the voluntariness or obligation to provide consent for processing

In case the data subject wishes to receive news and marketing information from CORWIN SK a.s., the data subject is required to provide CORWIN SK a.s., as the controller, with at least their email address and grant consent for the processing of their Personal Data for direct marketing purposes. Otherwise, it will not be possible to subscribe to the newsletter and marketing information sent by CORWIN SK a.s. Providing consent for the processing of Personal Data for direct marketing purposes is a legal requirement, without which CORWIN SK a.s. is not allowed to send news and marketing information. Of course, whether the data subject decides to provide their Personal Data for the purpose of receiving news and marketing information is their voluntary decision, and the failure to provide such Personal Data should not have any significant consequences for the data subject.

V. Recipients or categories of recipients of Personal Data

It is anticipated that the Personal Data processed on behalf of CORWIN SK, a.s., 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 we use in the course of our activities. We carefully select processors to ensure compliance with all data protection requirements.
- b) Authorized employees of CORWIN SK, a.s. (Hereinafter referred to as "recipients").

The transfer of Personal Data to third countries (outside the European Union and the European Economic Area) or to international organizations does not take place.

VI. Retention period of Personal Data

Personal Data processed for direct marketing purposes will be processed until the "unsubscribe" option from the newsletter is selected or until the granted consent for the processing of Personal Data is withdrawn, or until an objection to the processing of Personal Data is submitted, but no longer than 5 years from the date of granting consent. Personal Data processed for statistical purposes will be processed during the period of processing according to the previous sentence.

VII. Information regarding automated individual decision-making

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

VIII. 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:

Right to request access to Personal Data that concerns you from the controller:

The data subject has the right to obtain confirmation from CORWIN SK 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 SK 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.

Right to rectification of personal data:

The data subject has the right to have CORWIN SK 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.

Right to erasure (right to be forgotten):

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

- a) the Personal Data are no longer necessary for the purposes for which they were collected or otherwise processed;
- b) 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;
- c) 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;
- d) the Personal Data have been unlawfully processed;
- e) the Personal Data must be erased to comply with a legal obligation under Union or Member State law to which the Controller is subject;
- f) the Personal Data were collected in relation to the offer of information society services under Article 8(1) of the GDPR.

If CORWIN SK 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.

- **Right to erasure does not apply where processing is necessary:**
 - a) for the exercise of the right to freedom of expression and information;
 - b) 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;
 - c) 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;
 - d) 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
 - e) for the establishment, exercise, or defence of legal claims.

d) at any time and free of charge by clicking the relevant link found in every delivered newsletter.

CORWIN SK is obliged to take appropriate measures and provide the data subject with information according to Articles 13 and 14 of the GDPR Regulation and notifications according to Articles 15 to 22 of the GDPR Regulation regarding the processing of their personal data, in a concise, transparent, understandable, and easily accessible form. CORWIN SK provides cooperation to the data subject in the exercise of their rights under Articles 15 to 22 of the GDPR Regulation.

CORWIN SK is obliged to provide the data subject with information about the measures taken based on their request under Articles 15 to 22 of the GDPR Regulation within one month of receiving the data subject's request. This period may be extended by CORWIN SK for up to two additional months, taking into account the complexity, difficulty, and number of requests, even repeatedly. However, CORWIN SK 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 SK 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 under Article 77 of the GDPR Regulation with the Office for Personal Data Protection of the Slovak Republic.

- **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:

- a) the data subject contests the accuracy of the personal data, for a period enabling the Controller to verify the accuracy of the personal data;
- b) the processing is unlawful, and the data subject objects to the erasure of the Personal Data and requests the restriction of their use instead;
- c) 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;
- d) 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 SK before the restriction is lifted.

- **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:

- a) 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
- b) 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.

- **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.

- **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 Slovak 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 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 the expiration of the period for which consent was granted, by the following methods:

- a) by mail to the registered office of CORWIN SK;
- b) by email to CORWIN SK;
- c) by phone;