

## **INFORMATION ON THE PROCESSING OF PERSONAL DATA**

provided under 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, and repealing Directive 95/46/EC (General Data Protection Regulation, "GDPR") and under Act No. 18/2018 Coll. on Personal Data Protection, and on the amendment of certain Acts ("Personal Data Protection Act").

**Controller:** CORWIN SK a.s.  
Registered office: Mýtna 48, 811 07 Bratislava  
ID No. 45 500 126  
(hereinafter referred to as "CORWIN SK a.s." or "Controller")

is managing the construction of several development projects. Detailed information on the projects being carried out by CORWIN SK a.s. is available at: <http://corwin.sk/#portfolio> ("Projects"). Since you have indicated that you are interested in being informed through direct mail, newsletter, tailored offers, or in another appropriate form about news and current information on offers regarding our Projects and other activities carried out by CORWIN SK a.s., CORWIN SK a.s. therefore processes your Personal Data as a data subject to the following extent: a) name and surname, and b) email address ("Personal Data").

### **I. Identification of the Controller and contact information**

The Controller on whose behalf Personal Data is processed is CORWIN SK a.s., with its registered office at: Námestie Mateja Korvína 1, 811 07 Bratislava - mestská časť Staré Mesto, ID No. 45 500 126, registered in the Commercial Register at Bratislava III Municipal Court, section: Sa, file No. 5015/B. Contact details are as follows: **phone: +421 2 5441 6009, 5441 6007, fax: +421 2 5441 6011, e-mail: [corwin@corwin.sk](mailto:corwin@corwin.sk)**.

### **II. Definition of the purposes of processing and determination of the legal basis**

CORWIN SK a.s. processes Personal Data to the extent in which you as a data subject provided it for the following purposes:

- **direct marketing:** informing the data subjects as clients or potential clients about news concerning individual Projects carried out by CORWIN SK a.s. and to contact data subjects with additional marketing offers from CORWIN SK a.s. through direct mail, newsletter, tailored offers, or in another appropriate form. The legal basis for processing Personal Data is consent if the client or potential client provides their name, surname and email address and agrees to the processing of their Personal Data for the purpose of being sent business and marketing information by CORWIN SK a.s.;
- **statistical purposes:** to combine the Personal Data with data of other clients to create reports to improve the services provided by CORWIN SK a.s., while adhering to technical and organisational measures to ensure compliance with the principle of data minimisation. The legal basis for the processing of Personal Data is the further processing of Personal Data (Article 5(1)(b) in connection with Article 89(1) of GDPR) – Personal Data is never the result of such processing; only aggregated/anonymised information (e.g. the number of customers or economic statistics) is produced;

### **III. Categories of data subjects**

CORWIN SK a.s. processes Personal Data for the purposes specified in Article II of interested parties as data subjects who have expressed their interest to CORWIN SK a.s. in receiving news related to the real estate offered within Projects and their interests in news related to CORWIN SK a.s.

### **The data subject's right 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, the Personal Data shall no longer be processed for such purposes.

### **IV. Instruction on voluntary or mandatory provision of consent to processing**

If a data subject is interested in having CORWIN SK a.s. send news and marketing information, the data subject is obliged to provide CORWIN SK a.s., as the Controller, at least their e-mail address and consent to the processing of their Personal Data for direct marketing purposes, otherwise it is not possible to subscribe to news and marketing information sent by CORWIN SK a.s. Consent to the processing of Personal Data for direct marketing purposes is a legal requirement without which CORWIN SK a.s. is not permitted to send news and marketing information. Of course, if a data subject decides to provide their Personal Data to receive news and marketing information, they do so voluntarily, and any failure to provide this data should not have any material consequences for them.

### **V. Recipients or categories of recipients of Personal Data**

It is expected that the Personal Data processed on behalf of CORWIN SK a.s. for the purposes under Article II herein shall be provided to the following recipients:

- a) processors who have been authorized in writing to process the Personal Data by the Controller. These are primarily IT service providers and other parties whose services we use in executing our activities. We consistently select processors to ensure that all data protection requirements are met,
- b) authorised employees of CORWIN SK a.s. ("recipients").

### **VI. Duration of Personal Data retention**

Personal Data processed for direct marketing purposes shall be processed until such time the data subject 'unsubscribes' from the newsletter or withdraws consent to the processing of their Personal Data or they submit an objection to the processing of their Personal Data, but no longer than 1 year period from the date of consent. Personal Data processed for statistical purposes shall be processed over the duration of the processing pursuant to the previous sentence.

### **VII. Information on automated individual decision-making**

CORWIN SK a.s. does not use any automated individual decision-making or profiling when processing Personal Data.

### **VIII. Information on other rights of clients and potential clients**

Subject to compliance with the terms and conditions set by the legal regulations concerning Personal Data protection, you, as a data subject, have the following rights:

#### **• Right to request access from the Controller to Personal Data concerning you:**

The data subject has the right to obtain from CORWIN SK a.s. confirmation as to whether or not Personal Data concerning them are being processed, and, where that is the case, access to the Personal Data and the following information: the purposes of the processing; the categories of Personal Data concerned; the recipients or categories of recipient to whom the Personal Data have been or will be disclosed, in particular recipients in third countries or international organisations; where possible, the envisaged 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 rectification or erasure of Personal Data or restriction of processing of Personal Data concerning the data subject or to object to such processing; the right to lodge a complaint with a supervisory authority; where the Personal Data are not collected from the data subject, any available information as to their source; the existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) of GDPR and, in these cases, at least meaningful information about the procedure used, as well as the meaning and expected consequences of such processing for the data subject. CORWIN SK a.s. shall provide a copy of the Personal Data being processed. For any additional copies requested by the data subject, the processor may seek adequate compensation corresponding to the administrative costs of processing the application.

#### **• Right to rectification:**

The data subject shall have the right to have CORWIN SK a.s. rectify any inaccuracies in their Personal Data without undue delay. Taking into account the purposes of the processing, the data subject shall have the right to have incomplete Personal Data completed, including by means of providing a supplementary statement.

#### **• Right to erasure ('right to be forgotten'):**

The data subject shall have the right to have CORWIN SK a.s. erase their Personal Data without undue delay and CORWIN SK a.s. shall erase this Personal Data without undue delay if any of the following reasons are met:

- a) the Personal Data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- b) the data subject withdraws their consent on which the processing is based according to Article 6(1)(a) or Article 9(2)(a) of GDPR, and where there is no other legal ground for the processing;
- c) the data subject objects to the processing pursuant to Article 21(1) of GDPR and there are no overriding legitimate grounds for the processing, or the data subject objects to the processing pursuant to Article 21(2) of GDPR;
- d) the Personal Data have been unlawfully processed;
- e) the Personal Data have to be erased for compliance with a legal obligation in Union or Member State law to which the Controller is subject;
- f) the Personal Data have been collected in relation to the offer of information society services referred to in Article 8(1) of GDPR.

Where CORWIN SK a.s. has made the Personal Data public and is obliged to erase the Personal Data, it shall take reasonable steps, including technical measures, taking into account available technology and the cost of implementation, to inform controllers which are processing the Personal

Data that the data subject has requested the erasure by such controllers of any links to, or copies or replication of, those Personal Data.

The right to erasure shall not apply to the extent that processing is necessary:

- a) to exercise the right of freedom of expression and information;
- b) to comply with a legal obligation which requires processing by 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 exercising 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 GDPR;
- d) for archival purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) of GDPR in so far as it is likely to render impossible or seriously impair the achievement of the objectives of that processing; or
- e) to establish, exercise, or defend legal claims.

• **Right to restrict processing:**

The data subject shall have the right to obtain from the controller restriction of processing where one of the following applies:

- a) the accuracy of the Personal Data is contested by the data subject, for a period enabling the controller to verify the accuracy of the Personal Data;
- b) the processing is unlawful and the data subject opposes 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 the processing, but they are required by the data subject for the establishment, exercising or defence of legal claims;
- d) the data subject has objected to processing pursuant to Article 21(1) of GDPR pending verification of whether the legitimate grounds of the controller override those of the data subject.

Where processing has been restricted under the provisions above, such Personal Data shall, with the exception of storage, only be processed with the data subject's consent or for the establishment, exercising or defence of legal claims, or for the protection of the rights of another natural or legal person, or for reasons of important public interest of the Union or of a Member State. A data subject who has obtained restriction of processing pursuant to the foregoing shall be informed by CORWIN SK a.s. before the restriction of processing is lifted.

• **Right to data portability:**

The data subject shall have the right to receive the Personal Data concerning them, which they have provided to a controller, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the controller to which the Personal Data have been provided, where: a) the processing is based on consent pursuant to Article 6(1)(a) or Article 9(2)(a) of GDPR or on a contract pursuant to Article 6(1)(b) of GDPR; and b) the processing is carried out by automated means. In exercising their right to data portability, the data subject shall have the right to have the Personal Data transmitted directly from one controller to another, where technically feasible. The exercising of the right shall be without prejudice to Article 17 of GDPR. That

right shall not apply to processing necessary for the performance of a task carried out in the public interest or in the exercising of official authority vested in the controller. The right to portability of personal data shall not adversely affect the rights of others.

• **Right to object to processing including the right to object to profiling (if any):**

Where Personal Data are processed for direct marketing purposes, the data subject shall have the right to object at any time to the processing of Personal Data concerning them for such marketing, which includes profiling to the extent that it is related to such direct marketing. Where the data subject objects to processing for direct marketing purposes, the Personal Data shall no longer be processed for such purposes.

• **Right to lodge a complaint with the supervisory authority:**

The supervisory authority to which the data subject may address their complaint in justified cases is the Office for Personal Data Protection of the Slovak Republic, with its registered office at Hraničná 12, 820 07 Bratislava 27.

• **Right to withdraw consent to processing:**

The data subject may at any time withdraw their consent without affecting the lawfulness of processing based on consent before its withdrawal.

The right to withdraw the consent at any time, even before the expiry of the period for which the consent was granted, may be exercised by the data subject, in particular in the following ways:

- a) by post sent to the registered address of CORWIN SK a.s.,
- b) at any time and free of charge by clicking on the relevant link in each delivered newsletter;
- c) via email to CORWIN SK a.s.;
- d) over the phone.

CORWIN SK a.s. shall be obliged to adopt adequate measures and provide the data subject with information under the §19 and §20 of Personal Data Protection Act and notices under the §21-§28 and §41 of Personal Data Protection Act, concerning the processing of their Personal Data in a concise, transparent, understandable and easily accessible form. CORWIN SK a.s. shall cooperate with the data subject in exercising their rights under §21 to §28 of the Personal Data Protection Act.

CORWIN SK a.s. shall be obliged to provide the data subject with information on measures taken on the basis of their application pursuant to §21 to §28 of the Personal Data Protection Act within one month of receiving the data subject's request. CORWIN SK a.s. may extend the period in justified cases depending on the complexity, comprehensiveness and number of applications for another two months, even repeatedly. CORWIN SK a.s. shall, however, be obliged to inform the data subject of any such extension within one month of receipt of the request, together with the reasons for the extension. If CORWIN SK a.s. does not take action on the request of the data subject, the controller shall inform the data subject without delay and at the latest within one month of receipt of the request of the reasons for not taking action and on the possibility of lodging a complaint under §100 of the Personal Data Protection Act to the Office for Personal Data Protection of the Slovak Republic.