

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: **AKZ INFRA, s. r. o.**
Registered office: Námestie Mateja Korvína 1, 811 07 Bratislava
ID No.: 47 335 874
(hereinafter referred to as „AKZ INFRA“ or „Controller“)

operates the parking facility at Zadunajská cesta – Einpark. As you have expressed interest in the parking offer for the Zadunajská cesta - Einpark parking facility, which AKZ INFRA presents through the website www.einparkoffices.sk, AKZ INFRA processes your personal data as a data subject to the following extent: a) first name and surname, b) email address, and c) telephone number (hereinafter collectively referred to as the "Personal Data").

I. Identification of the Controller and Contact Information

The Controller, on whose behalf Personal Data is processed is **AKZ INFRA, s. r. o.**, with its registered office at: Námestie Mateja Korvína 1, 811 07 Bratislava, ID No.: 47 335 874, registered in the Commercial Register of the Bratislava III Municipal Court, section: Sa, file No. 91135/B. Contact details are as follows: **tel.: +421 2 5441 6009, 5441 6007, fax: +421 2 5441 6011, e - mail: info@akzinfra.sk.**

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

AKZ INFRA processes Personal Data to the extent that it has been provided by you, as the data subject, for the following purposes:

- **The purpose of recording and supporting communication** in relation to the rental of parking spaces; The legal basis for the processing of Personal Data is the legitimate interest of AKZ INFRA (Article 6(1)(f) of the GDPR Regulation);
- **The purpose of pre-contractual communication** in the event of a potential contract between the data subject and the Controller for the rental of a parking space; 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 at the request of the data subject prior to entering into a contract, to agree on contract terms, draft, communicate, and subsequently conclude the relevant contracts; The legal basis for the processing of Personal Data necessary for the performance of a contract (Article 6(1)(b) of the GDPR Regulation);
- **Statistical purposes**, with the aim of combining Personal Data with data from other clients to create reports that help improve the services provided by AKZ INFRA, while adhering to technical and organizational measures to ensure compliance with the principle of data minimization. The legal basis for the processing of Personal Data is the further processing of Personal Data (Article 5(1)(b) in conjunction with Article 89(1) of the GDPR Regulation) – the result of such processing is never personal data, but aggregated/anonymized information (e.g., the number of customers we have or economic statistics).
- **The purpose of demonstrating, exercising, and defending legal claims.** The legal basis for the processing of Personal Data is the legitimate interest of AKZ INFRA (Article 6(1)(f) of the GDPR Regulation).
- **The purpose of fulfilling AKZ INFRA's obligations** under applicable legal regulations, such as tax obligations or consumer protection obligations in the internal market. The legal basis for the processing of Personal Data is the compliance with legal obligations (Article 6(1)(c) of the GDPR Regulation).

III. Categories of Data Subjects

AKZ INFRA processes Personal Data for the purposes outlined in Article II concerning clients and potential clients, as data subjects, who have expressed interest in parking offerings at the Zadunajská cesta - Einpark parking facility.

IV. Legitimate Interests pursued by AKZ INFRA

The legitimate interest of AKZ INFRA lies in the company's interests that are essential for the proper conduct of its business activities, particularly in maintaining records and supporting communication related to the rental of parking spaces, which forms one of the business activities of AKZ INFRA. In this context, the data subject voluntarily provides their Personal Data because they seek information or services from the Controller that they are interested in. The Controller does not engage in any additional separate activities to obtain the Personal Data of the data subject; rather, the data subject contacts the Controller on their own initiative to obtain additional information regarding the rental of parking spaces and the current offerings. The Controller does not actively seek out data; it only responds to the data subject's request and, if necessary, develops

communication related to the specific request of the data subject, which is essential for conducting its business activities. Without processing the Personal Data provided voluntarily by the data subject for the purpose of maintaining records and supporting communication regarding the rental of parking spaces, the Controller would not be able to receive and record requests from data subjects and subsequently respond to them. This would significantly limit its ability to rent out parking spaces, which is contrary to the Controller's interests and one of the fundamental aspects of its business operations. The legitimate interest of AKZ INFRA in the proper conduct of its business activities also includes demonstrating, exercising, and defending the company's legal claims that may arise from potential legal relationships (e.g., lease agreements) between the Controller and the data subject. In such cases, it may be necessary to use the data and information provided by the data subject during pre-contractual communication and negotiation of specific contract terms for the purpose of proving, exercising, and/or defending legal claims. The legal basis for processing Personal Data for the purposes outlined in Article II is, therefore, the legitimate interest of AKZ INFRA, in accordance with the relevant articles of the GDPR Regulation and the applicable provisions of the Data Protection Act, provided that, in the given case, such an interest of AKZ INFRA does not outweigh the interests or fundamental rights and freedoms of the data subject, which 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 and on grounds relating to their particular situation, to the processing of Personal Data concerning them, which is carried out based on the legal basis of the legitimate interest of the Controller—AKZ INFRA. AKZ INFRA, as the controller, may not further process the Personal Data unless it demonstrates legitimate grounds for the processing which override the interests, rights, and freedoms of the data subject, or for the proving, applying, or defending of legal claims.

V. Information on the voluntariness or obligation to provide Personal Data

If the data subject expressed interest to be contacted by AKZ INFRA for the purpose of sending an offer regarding the rental options for parking spaces at the Zadunajská cesta - Einpark parking facility within the Einpark Offices project and for related communication and potential conclusion of a rental agreement, the data subject is required to provide AKZ INFRA, as the Controller, with their Personal Data (at a minimum, their first name, last name, email address, and phone number) for further communication. Otherwise, AKZ INFRA will not be able to contact the data subject, and the data subject will not receive the necessary information regarding the rental of parking spaces at the Zadunajská cesta - Einpark facility within the Einpark Offices project. Providing Personal Data for the purpose of contacting and communicating about the rental of parking spaces is entirely voluntary, and any decision not to provide such data will not have significant consequences for the data subject.

VI. Recipients or categories of recipients of Personal Data

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

- a) Intermediaries who have been formally authorized in writing by the Controller to process Personal Data. This primarily includes providers of IT services and other individuals whose services we use during the execution of our activities. Intermediaries are selected to ensure compliance with all data protection requirements.
- b) CORWIN SK a.s., with its registered office at Námestie Mateja Korvína 1, 811 07 Bratislava - Old Town, Company ID: 45 500 126, registered in the Commercial Register of the Bratislava III District Court, Section: Sa, File No. 5015/B.
- c) Einpark Office, a. s., with its registered office at Mýtna 48, 811 07 Bratislava - Old Town, Company ID: 51 099 055, registered in the Commercial Register of the Bratislava III District Court, Section: Sa, File No. 6644/B, as the owner of the property where the parking spaces are located.
- d) Public authorities, including courts and law enforcement agencies.
- e) Other directly affected individuals.
(further referred to as "recipients").

VII. Retention period of Personal Data

Personal Data processed for the purpose of record-keeping and communication support related to the rental of parking spaces will be processed for the duration of the communication regarding the interest of the client or potential client in parking at the Zadunajská cesta - Einpark parking lot within the Einpark Offices project, which is operated by the Controller, as well as for the duration of the communication regarding negotiations on the conclusion of contracts, as well as any accompanying communication. In the event of the conclusion of the relevant contract (lease, etc.), this data will be retained in connection with the execution of the transaction for at least the period required by the relevant legal regulations for the enforcement and/or defence of rights arising from the contractual relationship. Personal Data processed for the purpose of proving, exercising, and defending legal claims of the data subjects will be processed for at least the period required by the relevant legal regulations, or will be processed for the duration of the Controller's rights and claims, particularly for the duration of the limitation periods established by legal regulations, typically for a maximum of 10 years after the termination of the contractual relationship (if such a relationship was established), or until the conclusion of disputes and other proceedings related to the Controller's claims or

the defence of the Controller's rights. Personal Data processed for the purpose of fulfilling the obligations of the company AKZ INFRA will be processed for as long as AKZ INFRA is required to fulfil obligations under the relevant legal regulations (regulations governing 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 above-mentioned retention periods for other purposes.

VIII. Information on automated individual decision-making

AKZ INFRA does not use any automated individual decision-making processes or profiling in the processing of Personal Data.

IX. Information on other rights of clients and potential clients

Subject to the conditions set forth by legal regulations governing 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 confirmation from AKZ INFRA as to whether Personal Data concerning them is being processed, and if so, to access such Personal Data and receive the following information: the purposes of the processing; the categories of Personal Data concerned; the recipients or categories of recipients to whom the Personal Data have been or will be disclosed, particularly recipients in third countries or international organizations; if possible, the anticipated duration of the data retention or, if not possible, the criteria used to determine that duration; the existence of the right to request from the Controller the rectification or erasure of Personal Data concerning the data subject or the 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 was not obtained from the data subject, any available information as to its source; the existence of automated decision-making, including profiling as referred to in Article 22(1) and (4) of the GDPR, and in such 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. AKZ INFRA 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 obtain from AKZ INFRA the rectification of inaccurate Personal Data concerning them without undue delay. Taking into account the purposes of processing, the data subject also has the right to complete incomplete Personal Data, including by means of providing a supplementary statement.

• Right to erasure (Right to be forgotten):

The data subject also has the right to obtain from AKZ INFRA the erasure of Personal Data concerning them without undue delay, and AKZ INFRA 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 consent on which the processing is based under Article 6(1)(a) or Article 9(2)(a) of the GDPR, and there is no other legal ground 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 processed unlawfully;
- 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 have been collected in relation to the offer of information society services referred to in Article 8(1) of the GDPR.

Where AKZ INFRA 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 does not apply if processing is necessary:

- For exercising the right of freedom of expression and information;
- For compliance with 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, insofar as the right referred to above is likely to render impossible or seriously impair the achievement of the objectives of that processing; or

e) For the establishment, exercise, or defence of legal claims.

• Right to restriction of processing:

The data subject has the right to obtain from the Controller a restriction of processing in 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 needs them for the establishment, exercise, or defence of legal claims;
- The data subject has objected to processing under Article 21(1) of the GDPR, pending verification as to whether the legitimate grounds of the controller override those of the data subject.

When processing is restricted in accordance with the above, such Personal Data shall, except for storage, only be processed with the data subject's consent or for the establishment, exercise, or defence of legal claims, or to protect the rights of another natural or legal person, or for reasons of substantial public interest of the Union or of a Member State. AKZ INFRA will inform the data subject before the restriction of processing is lifted.

• Right to Data Portability:

The data subject has the right to receive the Personal Data concerning them, which they have provided, in a structured, commonly used, and machine-readable format, and the right to transmit those data to another controller without hindrance from the controller to whom the 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 has the right to have the Personal Data transmitted directly from one controller to another, where technically feasible. The exercise of this right shall not adversely affect the rights and freedoms of others. 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.

• Right to Object to Processing, Including Profiling:

The data subject has the right to object, on grounds relating to their particular situation, to the processing of Personal Data concerning them which is based on Article 6(1)(e) or (f) of the GDPR, including profiling based on those provisions. The controller shall 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 are 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, 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 shall no longer be processed for such purposes.

• Right to Lodge a Complaint with a Supervisory Authority:

The data subject has the right to lodge a complaint with a supervisory authority, which in Slovakia is the Office for Personal Data Protection of the Slovak Republic, located at Hraničná 12, 820 07 Bratislava 27.

• Right to Withdraw Consent (where Personal Data is processed based on consent):

Where processing is based on consent, 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.

AKZ INFRA is obligated to take appropriate measures and provide the data subject with information in accordance with Sections 19 and 20 of the Personal Data Protection Act, and notices according to Sections 21 to 28 and 41 of the Personal Data Protection Act, related to the processing of their personal data, in a concise, transparent, intelligible, and easily accessible form. AKZ INFRA shall assist the data subject in exercising their rights under Sections 21 to 28 of the Personal Data Protection Act.

AKZ INFRA must provide the data subject with information about the measures taken in response to their request under Sections 21 to 28 of the Personal Data Protection Act within one month of receiving the request. This period may be extended by up to two additional months, taking into account the complexity and number of requests. However, AKZ INFRA must inform the data subject of any such extension within one month of receiving the request, along with the reasons for the delay. If AKZ INFRA does not take action on the data subject's request, it must inform the data subject within one month of receiving the request about the reasons for not acting and the possibility to lodge a complaint with the Office for Personal Data Protection of the Slovak Republic.