

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 the amendment of certain Acts ("Personal Data Protection Act").

Controller: **Einpark Office, a. s.**
Registered office: Mýtna 48, 811 07 Bratislava
ID No.: 51 099 055
(hereinafter referred to as „Einpark Office“ or „Controller“)

As the owner of the Einpark Office property, we process your personal data in the event that you express interest in leasing or purchasing office space or a commercial unit within our property, Einpark Office, located on Zadunajská cesta in Bratislava. Since you have shown interest in scheduling a meeting and receiving a specific offer related to spaces within the Einpark Office project, which are being offered for sale or lease by Einpark Office, we process your personal data as a data subject to the following extent: a) first name and last name, b) email address, and c) telephone number (hereinafter collectively referred to as "**Personal Data**" with respect to items a) through c)).

I. Identification of the Controller and contact details

The Controller on whose behalf the Personal Data is processed is Einpark Office, a. s., with its registered office at Mýtna 48, 811 07 Bratislava, ID No.: 51 099 055, registered in the Commercial Register of the Bratislava III Municipal Court, Section: Sa, Insert No. 6644/B. The contact details are: Tel.: +421 2 5441 6009, 5441 6007, Email: corwin@corwin.sk.

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

Einpark Office processes Personal Data to the extent in which you as a data subject provided it for the following purposes:

- **The purpose of the processing is to record and support communication** related to the sale and lease of office spaces/commercial units. The legal basis for processing the Personal Data is the legitimate interest of Einpark Office (Article 6(1)(f) of the GDPR).
- **The purpose is pre-contractual communication** in the event of a potential contract between the data subject and the Controller for the sale or lease of office spaces/commercial units. 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, including negotiating contract terms, drafting, communicating, and subsequently concluding the relevant contracts. The legal basis for processing the Personal Data necessary for the performance of the contract is Article 6(1)(b) of the GDPR.
- **Statistical purposes**, aimed at combining Personal Data with data from other clients to create reports that help improve the services provided by Einpark Office, while adhering to technical and organizational measures to ensure compliance with 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) – the outcome of such processing never results in personal data but rather aggregated/anonymized information (e.g., the number of customers or economic statistics).
- **The purpose of proving, claiming, and defending legal claims.** The legal basis for processing Personal Data is the legitimate interest of Einpark Office (Article 6(1)(f) of the GDPR Regulation);
- **the purpose of fulfilling obligations** of Einpark Office according to relevant legal regulations, such as tax obligations or obligations concerning consumer protection in the internal market. The legal basis for processing Personal Data is the performance of legal obligations (Article 6(1)(c) of the GDPR Regulation).

III. Categories of Data Subjects

Einpark Office processes Personal Data for the purposes outlined in Article II, related to clients and potential clients as data subjects. These are individuals for whom Einpark Office has recorded an interest in the offer of office spaces or commercial units within the Einpark Office project.

IV. Legitimate interests pursued by Einpark Office

The legitimate interest of Einpark Office lies in interests that are important and necessary for the proper conduct of its business activities, particularly in the form of recording and supporting communication related to the sale and lease of office spaces/commercial units which forms one of the business activities of Einpark Office. In this context, the data subject provides their Personal Data voluntarily, as they are requesting information/services from the Controller that they are interested in. The Controller does not undertake any additional activities to obtain Personal Data of the data subject; rather, the data subject contacts the Controller themselves for the purpose of obtaining additional information regarding the purchase and/or lease of office spaces/commercial units from the Controller and

its current offer. The Controller does not actively seek out anything but responds to the data subject's request and, if necessary, develops communication regarding the specific request of the data subject, which is essential for the realization of its core business activities. Without processing the provided Personal Data (voluntarily given by the data subject) for the purpose of recording and supporting communication related to the sale and lease of office spaces/commercial units, the Controller would be unable to receive and record requests from data subjects and subsequently respond to them, which would significantly limit its ability to sell/lease the spaces in the owned property, which is contrary to its interest and the fundamental framework of its main business activities.

The legitimate interest of Einpark Office, within the context of its interest in the proper conduct of business activities, also includes the proving, claiming, and defending legal claims that may arise from potential legal relationships (e.g., lease, sale) between the Controller and the data subject. In such cases, there may be a need to use the data and information provided by the data subject to Einpark Office during pre-contractual communication and negotiation of specific contract terms for the purpose of proving, claiming, and defending a right. The legal basis for processing Personal Data for the purposes stated in Article II is therefore the legitimate interest of Einpark Office, in accordance with the relevant article of the GDPR and the applicable provisions of the Data Protection Act, provided that in the given case, such interest of Einpark Office does not override the interests or 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 and for reasons 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 - Einpark Office, a. s.. Einpark Office, a. s. 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. Instruction on voluntary or mandatory provision of consent to processing

In the event that the data subject has expressed interest in being contacted by Einpark Office to schedule a meeting and present the options for office spaces/commercial units within the Einpark Office project, and for related communication and potential contract negotiation for the purchase/lease of office spaces/commercial units, the data subject is required to provide Einpark Office, as the Controller, with their Personal Data (at a minimum, their name, surname, email address, and telephone number) for the purpose of further communication. Otherwise, Einpark Office will not have the capability to reach out to the data subject, and the data subject will not obtain the requested information about the offer of commercial spaces/office units within the Einpark Office project. Providing such Personal Data for the purpose of scheduling a meeting or other forms of communication regarding the commercial spaces/office units in the Einpark Office project is entirely voluntary, and the decision not to provide this information should not have any significant repercussions for the data subject.

VI. Recipients or categories of recipients of Personal Data

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

a) Processors who have been formally appointed by the Controller to process Personal Data. This includes, in particular, IT service providers and other individuals whose services we use in the course of our activities. We carefully select processors 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 – Staré Mesto, ID No.: 45 500 126. Authorized representatives of CORWIN SK a.s. will handle communications related to the processing of the data subject's request/inquiry, pre-contractual relationships with the data subject (e.g., lease or purchase of office spaces/commercial units), and coordination of property viewings. These entities will become recipients upon entering negotiations regarding the respective contracts.

c) Authorized representatives of Einpark Office.

d) AKZ INFRA, s. r. o., with its registered office at Námestie Mateja Korvína 1, 811 07 Bratislava, ID No.: 47 335 874 (supplier of electricity to the Einpark Office property). The Controller may provide necessary Personal Data to authorized representatives of AKZ INFRA, s. r. o. for negotiations related to the contractual relationship with the data subject before or after the main contract (sale/lease), particularly in relation to contracts concerning the supply of electricity to the relevant space of the data subject. These entities will become recipients upon entering into negotiations regarding contracts, such as the connection agreement and the consolidated electricity supply agreement.

(Hereinafter referred to as "**recipients**").

VII. Retention period of Personal Data

Personal Data processed for the purposes of recording and supporting communication related to the sale and lease of office space/commercial units will be processed for the duration of communication concerning the client's or potential client's interest in the spaces within the Einpark Office project, as well as during the negotiation of contracts and any associated communication. In the event of concluding a relevant contract (e.g., lease, purchase), these data will be retained in

connection with the transaction for at least the period required by applicable legal regulations for asserting and/or defending rights arising from the contractual relationship.

Personal Data processed for the purpose of proving, asserting, and defending legal claims will be retained for at least the period stipulated by applicable legal regulations, or for as long as the Controller's rights and claims are active, particularly for the duration of statutory limitation periods, typically up to 10 years following the end of the contractual relationship (if such a relationship was established), or until the resolution of disputes and other proceedings related to the Controller's claims or defense of its rights.

Personal Data processed for the purpose of fulfilling obligations of Einpark Office will be retained for as long as required by relevant legal regulations (e.g., accounting, archiving, consumer protection regulations) that necessitate the processing of Personal Data.

Personal Data processed for statistical purposes will be retained for the duration of the retention periods specified for other purposes mentioned above

VIII. Information on automated individual decision-making

Einpark Office does not use any automated individual decision-making processes, including profiling, in the processing of personal data.

IX. 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 Einpark Office, 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. Einpark Office, a. s. shall provide a copy of the Personal Data being processed. For any additional copies requested by the data subject, the Controller 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 Einpark Office, 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 Einpark Office, a. s. erase their Personal Data without undue delay and Einpark Office, 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 Einpark Office, 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 Einpark Office, 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):**

The data subject has the right to object at any time, on grounds relating to their particular situation, to the processing of their Personal Data carried out based on Article 6(1)(e) or (f) of the GDPR, including objections to profiling based on these provisions. The Controller must cease processing the Personal Data unless it can demonstrate compelling legitimate grounds for the processing that override the interests, rights, and freedoms of the data subject, or for the proving, asserting or defending of legal claims. If Personal Data is processed for direct marketing purposes, the data subject has the right to object at any time to the processing of their Personal Data 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, their Personal Data must 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.

• **Right to withdraw consent (if Personal Data is processed based on consent):**

If the processing of Personal Data 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.

The right to withdraw consent, even before the expiration of the period for which it was given, can be exercised by the data subject in the following ways:

- a) By mail to the registered office of Einpark Office,
- b) At any time and free of charge by clicking on the relevant link provided in each received newsletter,
- c) Via email to Einpark Office,

d) Via telephone.

Einpark Office is required to take appropriate measures and provide the data extended by up to two additional months in justified cases, considering the subject with information in accordance with Sections 19 and 20 of the Personal Data complexity, nature, and number of requests. However, Einpark Office must inform Protection Act, as well as notifications according to Sections 21 to 28 and 41 of the the data subject of any such extension within one month of receiving the request, Personal Data Protection Act, in a concise, transparent, intelligible, and easily along with the reasons for the delay. If Einpark Office does not take action based on accessible form. Einpark Office will assist the data subject in exercising their rights the data subject's request, it must inform the data subject of the reasons for not taking action and the possibility of lodging a complaint with the Office for Personal Data Protection of the Slovak Republic under Section 100 of the Personal Data Protection Act within one month of receiving the request.

Einpark Office must provide the data subject with information about the actions taken in response to their request under Sections 21 to 28 of the Personal Data Protection Act within one month of receiving the request.