

PERSONAL DATA PROCESSING INFORMATION **AND** **CONSENT TO DATA PROCESSING**

provided in accordance with Regulation (EU) No 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) (hereinafter also referred to as "GDPR") and in accordance with Act No 18/2018 on personal data protection and on amendment and supplementation to certain acts (hereinafter also referred to as the "Personal Data Protection Act").

The Controller: **CORWIN a.s.**
Registered office at: Mýtina 48, 811 07 Bratislava
Company ID No. (IČO): 45 500 126
(Hereinafter only „CORWIN a.s.“ or the „Controller“)

implements the construction of several development projects. Details on the projects implemented by CORWIN a.s. are available at: <http://corwin.sk/#portfolio> (hereinafter the "Projects"). Since you have expressed your interest in being informed on the news and up-to-date information and offers concerning our Projects and other activities carried out by CORWIN a.s., CORWIN a.s. is processing your personal data in the following scope: (a) name and surname, (b) e-mail address and (c) telephone number (data under letter (a) to (c) are hereinafter jointly referred to as "Personal Data").

CORWIN a.s. will disclose your Personal Data to other business companies within the CORWIN group (more details on the CORWIN group companies sponsoring individual Projects are available on the following links: <http://blumental.eu/>, <http://blumentaloffices.sk/>, <https://www.einpark.sk/>, <https://dubravvy.eu/>, <http://zahradydevin.sk/>, <http://www.rinze.sk/>

I. Controller identification and contact details

Personal Data are being processed on behalf of the Controller **CORWIN a.s.**, with registered office at: Mýtina 48, 811 07 Bratislava - Staré Mesto urban area, Company ID No. (IČO): 45 500 126, registered in the Business Register of the Bratislava I District Court, Section: Sa, File No. 5015/B. Contact details are: **Tel: +421 2 5441 6009, 5441 6007, Fax: +421 2 5441 6011, E-mail: corwin@corwin.sk**.

II. Definition of data processing purposes and legal ground

CORWIN a.s. is processing Personal Data in the scope as provided by you as the data subject for the following reasons:

- o **Direct marketing purposes**, to inform data subjects as the clients or potential clients about news related to individual Projects implemented by CORWIN a.s. and to address the clients with further marketing proposals of CORWIN a.s. through directmails, newsletters, targeted offers or by any other appropriate means. The legal ground for the processing of Personal Data is the legitimate interest of CORWIN a.s. or consent where a client or potential client provides the e-mail address and consents to processing of his Personal Data for the purpose of receiving business and marketing information from CORWIN a.s.;
- o **Purpose of recording and supporting communication in the sale of real estates**; The legal ground for the processing of Personal Data is the legitimate interest of CORWIN a.s. (Art. 6(1)(f) of GDPR);
- o **Statistical purposes**, to combine Personal Data with other clients' data for the purpose of creating messages that help enhance the services offered by CORWIN a.s. in compliance with technical and organisation measures in order to comply with the data minimisation principle. The legal ground for the processing of Personal Data is further processing of the Personal Data (Art. 5(1)(b) in conjunction with Art. 89(1) of GDPR);
- o **Purpose of recording data subjects' applications** and answering thereto by CORWIN a.s. The legal ground for the processing of Personal Data is the legitimate interest of CORWIN a.s. (Art. 6(1)(f) of GDPR);
- o **Purpose of compliance with the obligations** of CORWIN a.s. according to valid legal regulations, e.g. tax obligations or obligations relating to consumer protection in the internal market. The legal ground for the processing of Personal Data is the compliance with legal obligations (Art. 6(1)(c) of GDPR);

III. Categories of Data Subjects

CORWIN a.s. processes Personal Data as set forth in Art. II concerning clients and potential clients as data subjects that have expressed their interest in any of the Projects, whereof CORWIN a.s. has records.

IV. Legitimate interests of CORWIN a.s.

The legitimate interest of CORWIN a.s. is the possibility to inform the clients and potential clients about attractive offers relating to the Projects. Legal ground for the processing of Personal Data for the purposes of Art. II is the legitimate interest of CORWIN a.s. in accordance with the respective article of GDPR and the respective provision of the Personal Data Protection Act, provided that those interests of CORWIN a.s. are not overridden by the interests or rights and freedoms of the data subject, where personal data protection is required. If you do not wish to receive news and up-to-date information about attractive offers relating to the Projects, you can exercise, at any time, your right to object to processing of Personal Data by CORWIN a.s., in particular by the following means:

- a) by post to the address of the registered office of CORWIN a.s.;
- b) at any time and free of charge by clicking on the respective link located in every delivered newsletter;
- c) by e-mail delivered to CORWIN a.s.;
- d) by telephone.

If you object to processing of Personal Data, CORWIN a.s. will not continue to process your Personal Data and, after receipt of at least one of the expressions of will following subparagraphs (a) to (d) of this article, you will not receive any information about news from CORWIN a.s. anymore.

V. Instruction on the voluntary basis of or obligation to consent to processing

Where a data subject wishes to receive news and marketing information from CORWIN a.s., he must provide to CORWIN a.s. as the Controller at least his e-mail address and consent to processing of his Personal Data for direct marketing purposes, otherwise it is not possible to subscribe to news and marketing information sent by CORWIN a.s. Consent to processing of Personal Data for direct marketing purposes is considered to be a legitimate requirement.

VI. Recipients or categories of recipients of Personal Data

For the purposes of Article II, CORWIN a.s. expects to disclose the Personal Data processed to the following recipients:

- a) BLUMENTAL REZIDENCIA I, s.r.o., Mýtina 48, 811 07 Bratislava, Company ID No. (IČO): 47 257 270,
- b) BLUMENTAL REZIDENCIA II, s.r.o., Mýtina 48, 811 07 Bratislava, Company ID No. (IČO): 47 257 288,
- c) BLUMENTAL OFFICE I, s.r.o., Mýtina 48, 811 07 Bratislava, Company ID No. (IČO): 47 257 261,
- d) BLUMENTAL OFFICE II, s.r.o., Mýtina 48, 811 07 Bratislava, Company ID No. (IČO): 47 257 296,
- e) Dúbravy Rezidencia, s. r. o., Mýtina 48, 811 07 Bratislava, Company ID No. (IČO): 44 289 723,
- f) Einpark Office, a. s., Mýtina 48, 811 07 Bratislava, Company ID No. (IČO): 51 099 055,
- g) Einpark Rezidencia, a. s., Mýtina 48, 811 07 Bratislava, Company ID No. (IČO): 51 099 047,
- h) Záhrady Devín II, s.r.o., Mýtina 48, 811 07 Bratislava, Company ID No. (IČO): 50 198 351
- i) CC ETA, s. r. o., Mýtina 48, 811 07 Bratislava, Company ID No. (IČO): 50 286 480,
- j) CC THETA, s.r.o., Mýtina 48, 811 07 Bratislava, Company ID No. (IČO): 50 286 421,
- k) Lis Anker, s.r.o., Mýtina 48, 811 07 Bratislava, Company ID No. (IČO): 35 834 889,
- l) AKZ INFRA, s.r.o., Mýtina 48, 811 07 Bratislava, Company ID No. (IČO): 47 335 874,
- m) BLUMENTAL PROPERTY, s.r.o., Mýtina 48, 811 07 Bratislava, Company ID No. (IČO): 46 836 322,
- n) processors that have been assigned, in writing, to processing of Personal Data by the Controller. These are, in particular, companies within the CORWIN group, carriers, courier service companies, advisory companies and agencies, IT providers and other parties whose services we use in the performance of our activities. We select the processors carefully in order to comply with all rights in respect of personal data protection (hereinafter also referred to as the "Recipients").

VII. Personal Data retention period

Personal Data will be processed as long as the purpose of the Personal Data processing, for which they were obtained, exists; however, latest until termination of the legal ground for the processing of Personal Data according to GDPR and the Personal Data Protection Act.

VIII. Information on automated individual decision-making

In the Personal Data processing, CORWIN a.s. does not use any of the automated individual decision-making approaches, including profiling.

IX. Information on other clients' and potential clients' rights

Where the conditions set forth in the respective legal regulations applicable to personal data protection are met, as a data subject, you have the following rights:

• The right to request, from the Controller, access to all personal data concerning you:

The data subjects have the right to obtain from CORWIN 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; information on 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, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject. CORWIN a.s. will provide a copy of the Personal Data being processed. Any further copies requested by a data subject may be subject to adequate fees corresponding to the administrative costs of processing the request.

• Right to rectification of Personal Data:

The data subject has the right to obtain from CORWIN a.s. without undue delay the rectification of inaccurate Personal Data concerning him or her. Taking into account the purposes of the processing, the data subject has 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 has the right to obtain from CORWIN a.s. the erasure of Personal Data concerning him or her without undue delay and CORWIN a.s. has the obligation to erase Personal Data without undue delay where one of the following grounds applies:

- the Personal Data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- the data subject withdraws consent on which the processing is based according to point (a) of Article 6(1), or point (a) of Article 9(2) of GDPR, and where there is no other legal ground for the processing;
- 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;
- the Personal Data have been unlawfully processed;
- 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;
- 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 a.s. has made the Personal Data public and is obliged to erase the Personal Data, CORWIN a.s., taking account of available technology and the cost of implementation, will take reasonable steps, including technical measures, 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 copy or replication of, those Personal Data.

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

- for exercising the right of freedom of expression and information;
- for compliance 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 exercise of official authority vested in the Controller;
- for reasons of public interest in the area of public health in accordance with points (h) and (i) of Article 9(2) as well as Article 9(3) of GDPR;
- for archiving 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 the right referred to above is likely to render impossible or seriously impair the achievement of the objectives of that processing; or
- 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 restriction of processing where one of the following applies:

- 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;

- the processing is unlawful and the data subject opposes 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 the processing, but they are required by the data subject for the establishment, exercise or defence of legal claims;
- the data subject has objected to processing pursuant to Article 21(1) of GDPR pending the verification whether the legitimate grounds of the controller override those of the data subject.

Where processing has been restricted under the above paragraph, such Personal Data will, with the exception of storage, only be processed with the data subject's consent 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 important public interest of the Union or of a Member State. A data subject who has obtained restriction of processing pursuant to the above paragraph will be informed by CORWIN a.s. before the restriction of processing is lifted.

• Right to data portability:

The data subject has the right to receive the Personal Data concerning him or her, which he or she has 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 which the Personal Data have been provided, where: (a) the processing is based on consent pursuant to point (a) of Article 6(1) or point (a) of Article 9(2) of GDPR or on a contract pursuant to point (b) of Article 6(1) of GDPR; and (b) the processing is carried out by automated means. In exercising his or her right to data portability, 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 is without prejudice to Article 17 of GDPR. That 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 may not adversely affect the rights and freedoms of others.

• Right to object to processing, including the right to object to profiling (where applicable):

The data subject has the right to object, on grounds relating to his or her particular situation, at any time to processing of Personal Data concerning him or her which is based on point (e) or (f) of Article 6(1) of GDPR, including profiling based on those provisions. The Controller will no longer process the Personal Data unless the Controller demonstrates 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. Where Personal Data are processed for direct marketing purposes, the data subject has the right to object at any time to processing of Personal Data concerning him or her 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 will no longer be processed for such purposes.

• Right to lodge a complaint with a supervisory authority:

The supervisory authority to which the data subject may address, in justified cases, his or her complaint is Úrad na ochranu osobných údajov Slovenskej republiky, with registered office at Hraničná 12, 820 07 Bratislava 27.

• Right to withdraw consent to processing:

Where the legal ground for the processing of Personal Data is the consent of the data subject, the data subject has the right to withdraw his or her consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal;

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

- by post to the address of the registered office of CORWIN a.s.;
- at any time and free of charge by clicking on the respective link located in every delivered newsletter;
- by e-mail delivered to CORWIN a.s.;
- by telephone.

CORWIN a.s. is obliged to take reasonable actions and provide the data subject with the information pursuant to Section 19 and Section 20 of the Personal Data Protection Act and notices pursuant to Section 21 to Section 28 and Section 41 of the Personal Data Protection Act concerning processing his or her Personal Data, in a brief, transparent, clear and easily accessible form. CORWIN a.s. provides assistance to the data subject in exercising his or her rights pursuant to Section 21 to Section 28 of the Personal Data Protection Act.

CORWIN a.s. is obliged to provide the data subject with any and all information on action taken based on his or her request pursuant to Section 21 to Section 28 of the Personal Data Protection Act within one month of receipt of the request. In justified cases, CORWIN a.s. may extend that period by two further months where necessary, even repeatedly, taking into account the complexity and number of the requests. However, CORWIN a.s. is obliged to inform the data subject of any such extension within one month of receipt of the request, together with the

reasons for the delay. If CORWIN a.s. does not take action on the request of the data subject, it will 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 with the Slovak supervisory authority (Úrad na ochranu osobných údajov Slovenskej republiky) pursuant to Section 100 of the Personal Data Protection Act.

I hereby grant CORWIN a.s. my consent to processing my personal data and confirm that I have been informed in accordance with the above.