

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

provided under Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of individuals 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) and under Act No. 18/2018 Coll. on the Personal Data Protection and on Amendments to Certain Acts (hereinafter the "Act on Personal Data Protection").

Controller: **CORWIN a.s.**
registered seat: Námestie Mateja Korvína 1, 811 07 Bratislava
Company ID: 45 500 126
(hereinafter "CORWIN, a.s." or "Controller")

performs construction of several development projects. Detailed information on the projects carried out by CORWIN a.s. are available at: <http://corwin.sk> (hereinafter the "Projects"). Since you have indicated that you are interested in being informed about news and current information on offers regarding our Projects and other activities carried out by CORWIN a.s., CORWIN a.s. therefore processes your personal data as a data subject to the following extent: a) name and surname, b) e-mail address and c) phone number (data referred to in sub-par. (a) to (c) hereinafter collectively the "Personal Data").

CORWIN a.s. will provide your Personal Data to CORWIN Group companies (more information on CORWIN Group companies covering the individual Projects are available at: <https://www.corwin.sk/sk/projekty>, <https://www.corwin.sk/en/projects>).

I. Identification of Controller and Contact Data

Controller, in whose name the Personal Data are processed is **CORWIN a.s.**, with its registered office: Námestie Mateja Korvína 1, 811 07 Bratislava - Staré Mesto Municipality, ID No.: 45 500 126, registered in Comm. Reg. of District Court Bratislava I, Section: Sa, file No. 5015/B. Contact data : tel.: **+421 2 5441 6009, 5441 6007, fax: +421 2 5441 6011, e-mail: corwin@corwin.sk**.

II. Definition of Processing Purposes and Determination of the Legal Basis

CORWIN a.s. processes the Personal data to the extent that you, as a data subject, have provided them for the following purposes:

- **direct marketing**, informing the data subjects as clients or potential clients about news concerning individual Projects carried out by CORWIN a.s. and reaching out to the clients with additional marketing offers from CORWIN a.s. via direct mail, newsletter, tailored offers, or in other appropriate form. The legal basis for the processing of Personal Data is the legitimate interest of CORWIN a.s. or consent if the client or potential client provides an e-mail address and agrees to the processing of his/her Personal Data for the purpose of sending business and marketing information by CORWIN a.s.;
- **recording and promoting communications in the sale of real estate**; The legal basis for the processing of Personal Data is the legitimate interest of CORWIN a.s. (Article 6(1)(f) of the GDPR);
- **statistical purposes**, for the purpose of combining Personal Data with other clients' data to produce reports that help to improve the provision of services by CORWIN a.s., while adhering to technical and organizational measures in order to ensure compliance with the data minimisation principle. The legal basis for the processing of Personal Data is the further processing of Personal Data (Article 5 (1) (b) in assoc. with Article. 89, par. 1 of GDPR);
- **keeping records of the requests of the data subjects** and their handling by CORWIN a.s. The legal basis for the processing of Personal Data is the legitimate interest of CORWIN a.s. (Article 6(1)(f) of the GDPR);
- **performing obligations** by CORWIN a.s. in accordance with applicable legal regulations, such as tax or consumer protection obligations in the internal market. The legal basis for the processing of Personal Data is compliance with the legal obligations (Article 6 (1) (c) of the GDPR);

III. Categories of Data Subjects

CORWIN a.s. processes Personal Data for the purposes specified in Art. II concerning clients and potential clients, as data subjects, for whom CORWIN a.s. records that they have shown interest in any of the Projects.

IV. The legitimate interests pursued by CORWIN a.s.

Legitimate interest of CORWIN a.s. lies in the possibility of informing the clients and potential clients about beneficial offers related to Projects. The legal basis for

the processing of Personal Data for purposes under Art. II is therefore the legitimate interest of CORWIN a.s. under the applicable Article of the GDPR and the applicable provision of the Act on Personal Data Protection, provided that, in the present case, the interest of CORWIN a.s. not overridden by the interests or fundamental rights and freedoms of the data subject that require the protection of personal data. If you do not wish to receive news and current information on beneficial offers relating to the Projects, you may at any time exercise the right to object to the processing of Personal Data by CORWIN a.s., in particular in the following ways:

- 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 relevant link in each delivered newsletter;
- c) by e-mail to CORWIN a.s.;
- d) by phone.

If you object to the processing of Personal Data, CORWIN a.s. will discontinue processing your Personal Data, and upon receipt of at least one of any of the affirmative act under par. a) to d) of this Article, you will not receive any news from CORWIN a.s.

V. Instruction on Voluntary or Mandatory Provision of Consent

If the data subject wishes that CORWIN a.s. send the news and marketing information, the data subject is obliged to provide CORWIN 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 a.s. Providing consent to the processing of personal data for direct marketing purposes is a legal requirement.

VI. Recipients or Categories of Recipients of Personal Data

It is assumed that the Personal Data processed on behalf of CORWIN a.s., for the purpose under Art. II will be also provided to the following recipients:

- a) BLUMENTAL REZIDENCIA I, s.r.o., Mýtna 48, 811 07 Bratislava, ID No.: 47 257 270,
- b) BLUMENTAL REZIDENCIA II, s.r.o., Mýtna 48, 811 07 Bratislava, ID No.: 47 257 288,
- c) BLUMENTAL OFFICE I, s.r.o., Mýtna 48, 811 07 Bratislava, ID No.: 47 257 261,
- d) BLUMENTAL OFFICE II, s.r.o., Mýtna 48, 811 07 Bratislava, ID No.: 47 257 296,
- e) Dúbravy Rezidencia, s. r. o., Mýtna 48, 811 07 Bratislava, ID No.: 44 289 723,
- f) Einpark Office, a. s., Mýtna 48, 811 07 Bratislava, ID No.: 51 099 055,
- g) Einpark Rezidencia, a. s., Mýtna 48, 811 07 Bratislava, ID No.: 51 099 047,
- h) Záhrady Devín II, s.r.o., Mýtna 48, 811 07 Bratislava, ID No.: 50 198 351
- i) GUTHAUS s.r.o., s. r. o., Mýtna 48, 811 07 Bratislava, ID No.: 50 286 480,
- j) CC THETA, s.r.o., Mýtna 48, 811 07 Bratislava, ID No.: 50 286 421,
- k) Lis Anker, s.r.o., Mýtna 48, 811 07 Bratislava, ID No.: 35 834 889,
- l) AKZ INFRA, s.r.o., Mýtna 48, 811 07 Bratislava, ID No.: 47 335 874,
- m) BLUMENTAL PROPERTY, s.r.o., Mýtna 48, 811 07 Bratislava, ID No.: 46 836 322,
- n) Kvartet rezidence d.o.o., Tomšičeva ulica 3, 1000 Lubľana, ID: 8123012000,
- o) CORWIN SI d.o.o. Tomšičeva ulica 3, 1000 Lubľana, ID: 8190356000,
- p) Lis Anker SI, rganizacija izvedbe stavbnih projektov, d.o.o., Tomšičeva ulica 3, 1000 Lubľana, ID: 8585458000,
- q) processors who have been authorized in writing to process the Personal Data by the Controller. These include, in particular, CORWIN Group companies, delivery companies, courier companies, consulting companies and agencies, IT service providers and other persons whose services we use to carry out our business. We consistently select processors to ensure that all data protection requirements are met, (hereinafter the "Recipients").

VII. Retention period

Personal data will be processed until the purpose of processing the Personal Data, for which they were collected, ceases to exist, but no later than until the legal basis for the processing of Personal Data under the GDPR and the Act on Personal Data Protection exists.

VIII. Information on Automated Individual Decision-Making

CORWIN a.s. does not use any of the automated individual decision-making or profiling when processing 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 the data subject, have the following rights:

- **Right to request from the controller access to personal data concerning you:**

The data subject has the right to obtain from CORWIN a.s. confirmation as to whether or not personal data concerning him or her 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, 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. provides a copy of the personal data being processed. For any additional copies requested by the data subject, the processor may claim adequate compensation corresponding to the administrative costs of processing the application.

• **Right to Rectification:**

The data subject shall have 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 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 obtain from CORWIN a.s. the erasure of personal data concerning him or her without undue delay and CORWIN a.s. shall have 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, the controller, taking account of available technology and the cost of implementation, shall 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.

Right to erasure shall 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 in paragraph 1 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 shall have 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 provisions above, such personal data shall, 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 foregoing shall be informed by CORWIN, 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 him or her, which he or she has 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 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 shall have the right to have the personal data transmitted directly from one controller to another, where technically feasible. The exercise 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 exercise 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 processing including right to object profiling (if any):**

The data subject shall have 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 shall 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 shall have 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 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 addresses his or her 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:**

If the legal basis for the processing of personal data is the consent of the data subject, the data subject may at any time withdraw his or her 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:

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

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

CORWIN a.s. shall be obliged to provide the data subject with information on measures taken on the basis of his/her application pursuant to Sections 21 to 28 of the Act on Personal Data Protection within one month of receiving the data subject's request. CORWIN a.s. may extend the period in justified cases having regard to the complexity, comprehensiveness and number of applications for another two months, even repeatedly. CORWIN 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 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 Section 100 of the Act on Personal Data Protection to the Office for Personal Data Protection of the Slovak Republic.

I hereby grant CORWIN, a.s. the consent to processing my personal data and I confirm that I have been informed as provided above.