

1. THE ACTIVITIES OF THE COMPANY V INVEST CZ A.S.

- 1.1 The object of business of the company V Invest CZ a.s., ID No.: 25794655, with its registered office in Prague 5, Na Vidouli 1/1, Post Code 15000, registered in the Companies Register kept at the Municipal Court in Prague, under the File No. B 6096 (hereinafter referred to as "our company" or "we") is particularly the development and implementation of developer projects.
- 1.2 The integral part of the entrepreneurial activity is also marketing activity for promotion of the company and its goods and improvement of services to clients/ contractual partners within whose framework it comes also to processing of personal and contact data of contractual partners.

2. CONTROLLER OR PROCESSOR?

- 2.1 Our company is the controller of personal data.
- 2.2 Our company informs that it is not obliged to have the appointed representative for protection of personal data in the meaning of the Regulation. In the case that a necessity of its provision commences, our company shall notify of that its clients and business partners.

3. WHAT DO WE HAVE TO FULFIL TO BE ABLE TO PROCESS YOUR DATA?

- 3.1. Our company as a controller of personal data is obliged within processing of personal data to observe the duties arising from the Regulation (EU) 2016/679 of the European Parliament and of the Council (EU) on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (GDPR) (hereinafter referred to as "**Regulation**" or "**DPR**") and further from the Act on processing of personal data (hereinafter referred to as "**applicable legal regulations**"). Our company checks regularly the accordance of its procedures with the applicable legal regulations and treats responsibly to fulfil these obligations with emphasis on keeping privacy of natural persons and protection of their data. At the same time it ensures the necessary protection as well as for the third cooperation persons, who with regard to processing of personal data act or can act as controllers of personal data or their other controllers, processors or recipients of personal data (agencies administrating the web pages and so on.).

4. WHAT DATA DO WE PROCESS FOR YOU AND FOR WHAT PURPOSES?

- 4.1 The basic contact personal and contractual data of our clients, contractual partners and prospective clients are processed for the purpose of keeping the contractual relation and fulfilling the obligations arising from the business relation.
- 4.2 Personal data is further processed for the purpose of fulfilling the duties particularly the tax duties, duties against the other administrative or court, supervisory authorities and so on.

- 4.3 As well as the personal data is processed on the basis of legitimate interest of our company, particularly with regard to enforcement of legitimate claims of our company, support of entrepreneurial activities, marketing and administration of business relations.
- 4.4 Our company processes personal data of contractual partners and clients actually for the following purposes:
- a) negotiations on conclusion or alteration of the contract,
 - b) performance of the contract on provision of services,
 - c) performance of duties imposed by the law with regard to the contract in question if legal regulations expect such performance of the duty,
 - d) statement of contractual claims and performance of payment obligations,
 - e) performance of accounting and tax liabilities,
 - f) enforcement of receivables and assertion of other claims via courts or other independent institutions,
 - g) assessment of payment ability of clients,
 - h) basic contacting of a client,
 - i) negotiations with regard to client's changes and other needs at the client's request,
 - j) the back contact and creation of a business offer in offering of similar products and services,
 - k) marketing activities, particularly of client's records, research of client's satisfaction, sending of information messages on news related to the controller's activity etc.)
 - l) possibility of investment lease.
- 4.5 Personal data of prospective clients or contractual partners is processed for the purpose of the future making a contractual relation and sale of goods or services by our company.
- 4.6 Our company as a controller of personal data keeps electronic database (CRM system), in which it records the basic personal and contact data of clients/ business partners or prospective clients, evaluates their shopping behaviour for the purpose of provision of individualized offers for taking delivery of products and services.
- 4.7 For the purpose of marketing promotion of our company and improvement of services our company sends out to the clients/ business partners and future partners also business messages (newsletters, magazines, discount offers, actions, invitations, birthday wishes, researches of satisfaction, invitation to events etc.) to the electronic addresses provided by them, which were acquired in connection to purchase or provision of services or on the basis of the provided consent. A client/ contractual partner has the right to reject the sending of business messages whenever and without cost in a simple way, he is informed about that within every business message.
- 4.8 At the visit of the internet pages operated by our company it may happen that information will be stored in the form of "cookie" in the computer of the data subject, which recognizes it automatically at its next visit. Cookies enable, e.g. to adapt the web pages to the data subject interests or to store the user name, which is not needed to enter then every time. In the case that the data subject does not want that its computer will be recognized, it is

necessary to adapt the setting of the internet browser in such a way as to come to remove cookies from a hard disc of the computer, to block cookies or to set the warning prior to storage of cookies.

5. HOW THE DATA IS ACQUIRED TO OUR DATABASE?

- 5.1 We acquire new data to our database (CRM system) directly from our clients/ contractual partners.
- 5.2 We paste to our client's database the data
- a) acquired from the made contracts (where our company is a party to the contract)
 - b) acquired directly from the clients on the basis of a phone call, e-mail contact or filling in the form on the home web pages or the project's sites
 - c) acquired possibly directly from prospective contractual partners with their consents – particularly in the case of application for processing the offer of a business or service (either via the activities of business representatives at their visits, selling campaigns).

6. WHAT PERSONS HAVE ACCESS TO YOUR PERSONAL DATA, WHO DO WE TRANSFER THEM?

- 6.1 All the personal data is processed by our company as a controller.
- 6.2 With regard to necessary cooperation and synergies within the V Invest Group, when every individual developer project is implemented by the particular design company, with them our company shares also the control systems, the personal data of the clients/ contractual partners are made available as well as to the other companies of the V Invest Group.
- 6.3 The client database is not shared with another controller of personal data with the exception of the cases, when on the basis of express application and consent of the data subject we apply for provision of financial services or processing of their offer by mortgage specialist.
- 6.4 We can share restrictedly the processed data with processors, who ensure for us some activities such as:
- processing of accounting and tax office work,
 - provision of invoicing services,
 - law offices,
 - systemic support from the side of parent company or another concern company,
 - support in marketing activities (sending out of letter post, distribution of blanket e-mail offers including the offers sent out electronic mail, research of satisfaction of clients or the market, administration of client telephone and e-mail line, evaluation of shopping behaviour and similar marketing activities).
- 6.5 Further we can share the contact data of clients/ contractual partners to the limited extent with the companies, which provide us with transport, storage or control of sold goods, collection and disposal of unused sold goods and packaging or the contractual insurance company only to the necessary extent and for necessary time.

- 6.6 We provide IT services related with processing of data by ourselves using either our employees or external suppliers of IT services.
- 6.7 Processing of personal data for our company can be performed by the processors exclusively on the basis of the contract of processing of personal data, it means with guarantees of the organizational and technical security of this data and with determination of processing purpose and at the same time the processors may not use the data for other purposes.
- 6.8 Personal data may be made accessible with regard to fulfilling of legal obligations within the provided cooperation of administrative authorities particularly of bodies responsible for criminal proceedings, audit offices, courts, distrainers, insolvency administrators etc., always only to the extent determined by the law and upon their legitimate call.

7. HOW LONG DO WE HOLD IT?

- 7.1. We hold the data of contractual partners in the database for the whole time of duration of the contractual relation to be able to perform the contract and the contractual duties arising out of it and to execute the rights resulting from it. For the purpose of performing the contract we can process the needed personal data even without consent of the data subject.
For the needs of archiving and fulfilling of statutory archiving and audit duties and enforcing of legitimate claims of our company we hold personal data of data subjects for min. next 5 year after cessation of contractual relation. If legal regulations determine a shorter term to fulfil the archiving or audit duties particularly in relation to the tax office, the data is held for such a shorter term determined under the legal regulations.
- 7.2. The data, which we acquire with your consent or which is kept in the CRM system, is processed by us for the duration of the contract/consent. In the case of your withhold of your consent, the personal data is held and processed from now on, if it is necessary for effective enforcing the legitimate claims of the parties to the contract or if such duty results from legal regulations.
- 7.3. If the purpose of processing ceases to exist, all the data of the data subjects or the data, which served to the purpose in question, is erased from our database.

8. WHAT ARE THE RIGHTS OF NATURAL PERSONS IN PROCESSING OF THEIR PERSONAL DATA?

- 8.1 Natural person, who is a data subject, which is processed by us, has the right:
- a) to access to personal data under the Art. 15 GDPR
 - b) for rectification of incorrect personal data under the Art. 16 GDPR
 - c) to ask for erasure of your personal data under the Art. 17 GDPR
 - d) to raise an objection to processing under the Art. 21 GDPR
 - e) for restriction of processing under the Art. 18 GDPR
 - f) for transferability of data to the extent stipulated by applicable legal regulations under the Art. 20 GDPR

- g) to file a complaint at the Office for Personal Data Protection – further particulars on www.uoou.cz for the case that if its rights arising from the applicable legal regulations is breached.
- 8.2 If you have any question or you would like to ask for explanation referring to protection of personal data, please, contact us on the e-mail: info@vinvest.cz or phone number: +420 724 040 005

9. CONSEQUENCES OF NON-PROVISION OF PERSONAL DATA

- 9.1 Non-provision of personal data has a consequence of impossibility to conclude a contractual relation and impossibility resulting from it to fulfil the contractual duties. Consent to processing of personal data if this consent is given by you, may be withheld whenever free of charge to the e-mail address: info@vinvest.cz, or the telephone number +420 724 040 005, or in writing to the address of our company.

10. TRANSFER OF PERSONAL DATA OUTSIDE THE EUROPEAN UNION

- 10.1 Personal data is not transferred to third parties with the registered office outside the European Union.



INFORMATION ON PERSONAL DATA PROCESSING

clients/contractual partners in connection to sale of goods and provision of services and possible marketing activities of the company V Invest CZ a.s.

V Invest CZ a.s., Walterovo náměstí 329/3, 158 00 Prague 5

ID No.: 257 94 655