

## **PRIVACY NOTICE ON THE PROCESSING OF PERSONAL DATA AND YOUR RIGHTS**

*under Art. 13 and Art. 14 of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 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*  
(hereinafter referred to as the „**GDPR**“)

In view of the fact, that you or a third party provided us, as a contractual party specified in the agreement (including other relevant legal acts as for example power of attorney) or as an addressee specified in the mail or in case you are providing your personal data to us, we as a data controller of your personal data (hereinafter referred to as the “HB Reavis” or “we”) would like to inform you about the processing of your personal data and of your rights related to the said processing.

HB Reavis is part of the HB Reavis Group, which consists of all entities consolidated under the group holding HB Reavis Holding S.A. with its headquarters in Luxembourg (hereinafter referred to as the “HB Reavis Group”) due to which the reference to HB Reavis Group may be found in the Privacy Notice.

### **What are our purpose and legitimate interests for the processing of your personal data?**

- A) We process your personal data to ensure that our contractual obligations arising from the contract with you or a third party, of which you are in the position of a contact person or a signatory on behalf of the contractual party, are effectively fulfilled and also to be compliant with legal obligations under local law. Since we conducted the contract with you or the third party, we need to process your personal data to ensure effective, flawless and clear communication as well as to ensure fulfillment of our contractual obligations and legal obligations (tax and accounting) towards you or the third party. This processing also applies to other legal acts than contracts as for example power of attorney.
- B) We process your personal data for the purpose of incoming and outgoing mail evidence.
- C) We process your personal data for the purpose of sending information regarding the ongoing construction in your neighborhood or if you are a person concerned by the ongoing construction or replying to your queries regarding the ongoing construction. This information and communication will mainly concern the current state of construction, planned progress or associated constraints. Moreover, we might provide you with HB Reavis Group marketing activities related to the above-mentioned construction. When building our projects, we realize that it also affects the neighborhoods around the construction site or other person concerned by the ongoing construction. Therefore, we strive to have the best possible relationship with the residents living around the construction site or a person concerned by the ongoing construction. In order to achieve that, we maintain the transparent communication in which we share all the information regarding the construction.

In connection with the achievement of the above purposes, we may create a list of contact details for more effective communication.

### **What is our legal basis for the processing of your personal data?**

- A) We process your personal data on the basis of legitimate interests under Article 6 (1) (f) of GDPR or on the on the basis of the performance of a contract or pre-contractual relations in accordance with Article 6 (1) (b) of GDPR if you are a contractual party. When we handle the tax and accounting matters or we are obliged to conclude an agreement under the applicable law (e.g. Management of Rights of Light/Party Wall Agreements in the United Kingdom), we process your personal data

on the basis of a legal obligation under Article 6 (1) (c) of GDPR. If you or the third party fail to provide us with your personal data, we cannot fulfill our obligations.

- B) We process your personal data on the basis of legitimate interests under Article 6 (1) (f) of GDPR.
- C) We process your personal data on the basis of legitimate interests under Article 6 (1) (f) of GDPR.

#### **What kind of personal data do we process?**

- A) Title, name, surname, position, department, personal and employee number, business area, place of work, signature, e-mail, phone and fax number and identification information of your employer (incl. identification information of the entity on which behalf you act).
- B) Name, surname, address, telephone number and e-mail.
- C) Name, surname, address, telephone number and e-mail.

#### **How long do we store your personal data?**

As soon as we no longer need your personal data for the processing purposes for which the personal data have been collected, we will delete them unless the statute-barred period applies. Certain details and correspondence may be retained until the time limit for claims, in respect of the pre-contractual or contractual relationship, has expired or in order to comply with regulatory requirements regarding the retention of such personal data.

#### **With whom do we share your personal data?**

We may provide your personal data to the various entities acting as our processors, joint controllers or separate controllers. We may also provide your personal data to our business partners who provide us with:

- Consultancy services
- Auditing services
- Legal services
- Accounting services

Furthermore, we may share your personal data within the companies in HB Reavis Group. We also may be obliged to provide your personal data to public authorities, in particular courts and law enforcement agencies (police and prosecutors) only to the extent necessary and within the limits of the law.

#### **From whom do we get the personal data?**

We get personal data from you or the third party we have entered into a contract with (or other relevant legal act) or that stated your personal data in the mail.

#### **Do we use automated individual decision-making?**

No, we do not use automated individual decision-making.

#### **Do we transfer your personal data to third countries?**

Your personal data are processed within the territory of the Slovak Republic and other states of the European Union. Your personal data can be processed by a country outside of European Union if this third country has been confirmed by the European Commission as a country with adequate level of data protection or if other appropriate data protection safeguards exist (for example, binding corporate privacy rules or EU standard data protection clauses).

#### **Other information:**

Personal data may also, in justified cases, be subject to use (processing) for the purpose of dealing with legal matters, including the performance of public authority obligations and monitoring for possible legal protection. Personal data may also be archived for a given public interest, as well as for scientific, historical or statistical research.

#### **What are your rights?**

Your rights as a data subject are stated below. Please note that the exact conditions to exercise these rights are set out in detail in Chapter III of GDPR, while in a particular circumstance not all rights may be exercised. You have following rights:

- Access to personal data we process about you
- Rectification of incorrect or inaccurate personal data and add incomplete personal data
- Restriction, i.e. blocking of processing of your personal data
- The deletion of personal data in case the purpose absence or unauthorized data processing
- Submission of an objection to the processing of personal data if you believe that our data processing is not justified
- Be excluded from automated decision-making
- Listing of personal data in a structured and machine-readable format or for another controller
- Revocation of consent to the processing of personal data
- To lodge a complaint with the supervisory authority

#### **How can you exercise your rights?**

HB Reavis

Electronically: [dataprivacy@hbreavis.com](mailto:dataprivacy@hbreavis.com)

In writing to the address: specified in the agreement or in the mail

Telephone: +421 918 723 243

We strive to protect your privacy as much as possible and therefore we process your personal data in compliance with GDPR and all other relevant laws. However, if you disagree with the way we handle your personal data, you can exercise your rights via our Data Protection Officer at:

Data Protection Officer's contact: Erika Wild, contact point at Twin City C, Mlynské Nivy 16, 821 09 Bratislava, Slovak Republic, tel. +421 918 723 243, email: [dataprivacy@hbreavis.com](mailto:dataprivacy@hbreavis.com)

Or you can file a complaint in supervising authority regarding the processing of your personal data. Your local supervisory authority may be found at: [https://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index\\_en.htm](https://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm)