

PRIVACY NOTICE ON THE PROCESSING OF PERSONAL DATA AND YOUR RIGHTS

In case you are providing your personal data, we as a data controller (hereinafter referred to as the “**Controller**” or “**we**”/ “**our**”):

For United Kingdom:

HB Reavis Investments UK having its registered seat at Level 7 of 33 King William Street, London, EC4R 9AS, United Kingdom, ID No.: 13794984

For Hungary:

HB Reavis Investments Hungary Kft. having its registered seat at 1133 Budapest, Árbóc utca 1-3. HUB 3. ép. 5. em., registration number: Cg. 01-09-393147

For Poland:

HB Reavis Investments Poland sp. z o.o. z siedzibą w Warszawie, ul. Postępu 14, 02-676 Warszawa, wpisaną do rejestru przedsiębiorców Krajowego Rejestru Sądowego prowadzonego przez Sąd Rejonowy dla m.st. Warszawy w Warszawie, XIII Wydział Gospodarczy Krajowego Rejestru Sądowego, pod numerem KRS: 0000529663, NIP: 5272724097, REGON: 36012737400000

For Slovakia:

HB Reavis Investments Slovakia s. r. o., with its registered office at Mlynské Nivy 16, 821 09 Bratislava, ID number: 44 489 650, legal form: limited liability company registered in the Commercial Register of the District Court Bratislava I, section: Sro, file number: 55375 / B

For Germany:

HB Reavis Investments Germany GmbH, with its registered office: Kurfürstendamm 21, Kranzler Eck, D-10719 Berlin, Federal Republic of Germany, registration number: HRB 201594 B

hereby provide all the clients involved in the More by HB Reavis programme (hereinafter referred to as the “**Data Subject**” or “**you**”/ “**your**”) information about the processing of their personal data for the More by HB Reavis services. Unless otherwise stated, the terms herein have the same meaning as in the More by HB Reavis Terms and Conditions of the building.

The Controller is part of the HB Reavis Group, which consists of all entities consolidated under HB Reavis Holding S.A. with its headquarters in Luxembourg (hereinafter referred to as the “HB Reavis Group “).

If you are in our buildings, in their immediate vicinity (as a visitor, employee or for any other purpose) or if you install the More by HB Reavis application, your personal data may be processed for the following purposes:

The personal data is processed for the following purposes:

1. Provision of More by HB Reavis Services
2. Promotion of the company, brand, services, and events
3. My Office Life
4. Workplace Insights
5. Account registration
6. Desk Booking
7. Delivering notifications
8. GDPR or UK GDPR compliant

Further specification of each purpose please find below:

1. Provision of More by HB Reavis Services

What are our purposes for the processing of your personal data?

The personal data we process from you is used to provide the More by HB Reavis Services and protect and enforce the rights and interests of the Controller resulting from our relationship. This purpose includes the following processing activities:

- effective communication relating to the provision of the More by HB Reavis Services
- ensuring the investigation of your complaint or claim
- ensuring the proper performance of the More by HB Reavis Services
- fulfilling our obligations and exercising our rights under any agreements concluded between you and the Controller, including billing and collection contracts
- providing notification of the status of the More by HB Reavis Services, including information material from suppliers of individual services
- obtaining feedback
- reporting changes in connection with the More by HB Reavis Services
- verifying your identity
- providing admission to event activities

- your personal data is processed for the purpose of ensuring your attendance at the event. We will send e-mails and SMS messages to the Data Subjects during the provision of the More by HB Reavis Services. The Controller will send these emails and SMS messages and such emails or SMS messages may be of an informational or advertising nature. These activities are not considered to be spam by the Controller. Disagreement with sending these e-mails may be communicated by you electronically by using our Helpdesk

To learn more about how we process personal data when providing services using the More by HB Reavis application (e.g., contactless door opening), please see our FAQ section. Please click on the question mark on the top right bar in the application.

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

We process your personal data based on the performance of the agreement or based on your request to take measures before concluding the contract in accordance with Art. 6 (1) (b) GDPR or UK GDPR. In case the personal data is not provided, we will not be able to conclude an agreement with you and provide you with the More by HB Reavis Services.

What kind of personal data do we process?

We process personal data in the extent necessary to provide More by HB Reavis Services, and this to the maximal following scope: name, surname, title, address, e-mail address, telephone number, details of your employer and information necessary to properly provide a particular sub-service within the More by HB Reavis Services.

How long do we store your personal data?

We keep your personal data until the termination of the agreement we have entered with you, or until the end of the limitation period under applicable legislation.

2. Promotion of our company, brand, services, and events

What are our purposes and legitimate interest for the processing of your personal data?

We may process your personal data by taking photographs (which may include you) and audio-visual recordings, which are used for the purpose and legitimate interests of promotion of our events and services; and to help us improve our brand and goodwill by publishing the photographs and audio-visual recordings on our social media profiles such as YouTube, LinkedIn, Facebook, Twitter, and Instagram and via other channels such as our websites.

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

We process your personal data based on the legitimate interests under Article 6 (1) (f) of GDPR or UK GDPR.

What kind of personal data do we process?

Photograph or/and audio-visual image of yourself

How long do we store your personal data?

We may store your personal data until HB Reavis Group cease to be a corporate entity.

3. My Office Life

What are our purposes for the processing of your personal data?

The purpose of the personal data processing, to which the consent is granted by the Data Subject, is to ensure delivery of My Office Life functionalities within the More by HB Reavis application, such as information on Data Subjects network within his/her employer, on focus time, activity in the office (enumeration not exhaustive), to help the Data Subject work more efficiently, have information to drive the Data Subjects role within the employer and maintain a healthy work-life balance (using the application does not guarantee improvements in efficiency, performance of role or work-life balance, merely provides the Data Subject with a tool and information basis at a glance, on which he/she can decide to act).

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

The legal basis for the processing of personal data is **free consent** of the Data Subject under Article 6 (1) (a) of GDPR or UK GDPR. **Granting consent is voluntary**, so if the Data Subject is not interested in processing the personal data mentioned, he/she does not have to give the consent.

What kind of personal data do we process?

If the Data Subject grants this consent, the Controller can process the following data:

- ✓ indoor positioning data (positioning tag ID, timestamp, indoor position);
- ✓ pseudonymised ID;
- ✓ department;
- ✓ entry card ID;
- ✓ e-mail metadata from Microsoft 365;
- ✓ calendar metadata from Microsoft 365.

How long do we store your personal data?

The personal data of the Data Subject are processed by the Controller for the earlier of the: (a) the duration of the validity of this consent or (b) duration of employment at the Data Subject's current employer.

If retention of data is not necessary to achieve the purpose of the processing (e.g. data retention to provide historical context/data to the Data Subject), the Controller shall not retain this data and shall delete it after the purpose has been fulfilled.

The personal data of the Data Subject may be processed by the Controller for a longer period than mentioned above only if it is anonymised, necessary to comply with statutory obligations of the Controller or if it results from a public authority decision.

4. Workplace Insights

What are our purposes for the processing of your personal data?

The purpose of the personal data processing, to which the consent is granted by the Data Subject, is to ensure delivery of Workplace Insights functionalities within the More by HB Reavis application, such as (including but not limited to) information on ideal space, density alerts, achievements, environmental screen, and notifications, to help the Data Subject take full advantage of the workspace. Moreover, to help the Data Subject to get information on the workspace and submit their views with respect to the workplace setup, temperature and booking (using the application does not guarantee optimal use of workspace, merely provides the Data Subject with a tool and information basis at a glance, on which he/she can decide to act).

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

The legal basis for the processing of personal data is **free consent** of the Data Subject under Article 6 (1) (a) of GDPR or UK GDPR. **Granting consent is voluntary**, so if the Data Subject is not interested in processing the personal data mentioned, he/she does not have to give the consent.

What kind of personal data do we process?

If the Data Subject grants this consent, the Controller can process the following data:

- ✓ indoor positioning data (positioning tag ID, timestamp, indoor position);
- ✓ pseudonymised ID;
- ✓ department;
- ✓ entry card ID;
- ✓ e-mail metadata from Microsoft 365;
- ✓ calendar metadata from Microsoft 365.

How long do we store your personal data?

The personal data of the Data Subject is processed by the Controller for the earlier of the: (a) duration of the validity of this consent or (b) duration of employment at the Data Subjects current employer.

If retention of data is not necessary to achieve the purpose of the processing (e.g., data retention to provide historical context/data to the Data Subject), the Controller shall not retain this data and shall delete it after the purpose has been fulfilled.

The personal data of the Data Subject may be processed by the Controller for a longer period than mentioned above only if it is anonymised, necessary to comply with statutory obligations of the Controller or if it results from a public authority decision.

5. Account registration

What are our purposes for the processing of your personal data?

The Controller must process (directly or by means of third parties - processors) the information obtained from the Data Subject, via registration of an account in the More by HB Reavis, otherwise it will not be able to deliver the More by HB Reavis functionality. For avoidance of any doubt, the Data Subject is free to not register an account, but in such case the application functionality will not be able to be delivered by the Controller. The personal data will be used solely to administer the More by HB Reavis application including its basic functionalities and Data Subjects account.

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

Legal basis for processing of your personal data in connection with the More by HB Reavis is performance of a contract concluded by the Data Subject and the Controller to deliver basic More by HB Reavis application functionality under Article 6 (1) (b) of GDPR or UK GDPR.

What kind of personal data do we process?

When registering an account in the More by HB Reavis application:

1. If the Data Subject registers an account manually, data regarding the Data Subject's e-mail address and password will be obtained.
2. If the Data Subject registers an account through Microsoft single sign-on method enabled by his/her employer, the following data will be received from the single sign-on functionality (out of the control of the Controller and subject to rules determined by controller of the single sign-on functionality):
 - ✓ e-mail address;
 - ✓ name and surname;
 - ✓ Microsoft 365 ID (assigned by Microsoft);
 - ✓ proxy e-mail addresses assigned to the Data Subject;
 - ✓ Data Subjects department from Azure Active Directory;
 - ✓ ID, name and surname of Data Subjects manager from Azure Active Directory;
 - ✓ indoor positioning tag ID (however no position data will be collected to provide More by HB Reavis functionality).

How long do we store your personal data?

The personal data of the Data Subject is processed by the Controller only for the duration of More by HB Reavis account registration. If the account remains inactive for longer than 2 years, the account will be deactivated, and associated Data Subjects data will be permanently deleted.

6. Desk Booking

What are our purposes for the processing of your personal data?

The purpose of processing the personal data is to deliver the desk booking functionality to the Data Subject, where applicable.

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

Legal basis for processing of the Data subject's personal data in connection with More by HB Reavis application is performance of a contract concluded by the Data Subject and the Controller to deliver the More by HB Reavis application functionality under Article 6 (1) (b) of GDPR or UK GDPR.

What kind of personal data do we process?

If the Data Subject will use the desk booking services data to book a desk, the Data Subject's e-mail address, name and surname will be processed.

How long do we store your personal data?

We keep the Data Subject's personal data for one (1) month. After this period, we anonymized the personal data.

7. Delivering notifications

What are our purposes for the processing of your personal data?

The purpose of delivering notifications to the Data Subject (based on the choice of the Data Subject) is to keep him/her updated on the latest developments of the More by HB Reavis application and deliver news relevant to the Data Subject.

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

Legal basis for processing of the Data subject's personal data in connection with More by HB Reavis application is performance of a contract concluded by the Data Subject and the Controller to deliver the More by HB Reavis application functionality under Article 6 (1) (b) of GDPR or UK GDPR.

What kind of personal data do we process?

If the Data Subject allows notifications, a unique More by HB Reavis identifier will be created and processed for the Data Subject.

How long do we store your personal data?

We keep the Data subject's personal data until the termination of the agreement between the Controller and the Data Subject, or until the end of the limitation period under generally applicable legislation.

8. GDPR or UK GDPR compliant

What are our purposes for the processing of your personal data?

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.

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

Your personal data is processed while handling your complaint in accordance with Article 6 (1) (c) GDPR or UK GDPR, i.e., the processing is necessary for compliance with a legal obligation to which our company is subject.

What kind of personal data do we process?

Personal data provided by you when submitting the complaint (such as name, surname, e-mail, phone number etc.).

How long do we store your personal data?

We store your personal data for the period of time strictly necessary to deal with the complaint.

General provision to retention period
Once we no longer need your personal data for the purposes for which we processed it, we will delete your personal data or archive it for the period of time specified by law or the archiving plan.
With whom do we share your personal data?
We may also share your personal data with companies within the HB Reavis Group. We may also be obliged to disclose your personal data to state authorities and public authorities, (courts and law enforcement authorities i.e. (police and prosecutor), and only to the extent necessary as required by applicable and effective law to exercise their power. Based on multiple agreements with third parties acting as our intermediaries, joint controllers, or sole controllers, we provide your personal data to these companies and to the following extent:
<u>For Hungary</u>
<ul style="list-style-type: none"> • HB Reavis Hungary Kft. having its registered seat at 1133 Budapest, Árbóc utca 1-3. HUB 3. ép. 5. em, ID No.: 01-09-876641, legal form: limited liability company, for the purpose of ensuring the provision of the More by HB Reavis (receiving client assignments and ensuring their execution via external suppliers). • Darvas Laundry Kft. Having its registered seat at 1171 Budapest, Strázsahegy u. 22., identification number: 01- 09-943403, legal form: limited liability company, for the purpose of providing the More by HB Reavis service (ensuring orders by the customer and their execution through external suppliers). • Aranykerék Kft. having its registered seat at 1113 Budapest, Ábel Jenő utca 22. 1. em. 4., identification number: 01-09-997899, legal form: limited liability company, for the purpose of providing the More by HB Reavis service (ensuring orders by the customer and their execution through external suppliers). • Anno Gold Kft . having its registered seat at: 1138 Budapest, Váci út 134 / a, identification number: 01-09-883701, legal form: limited liability company, for the purpose of providing the More by HB Reavis service (ensuring orders by the client and their execution through external suppliers). • Kresz Tibor János Individual Contractor, having its registered seat at: 7626 Pécs, Alsóhavi utca 21. Legal form: sole proprietor, for the purpose of providing the More by HB Reavis service (ensuring orders by the client and their execution through external suppliers).
<u>For Slovakia:</u>
ISTROCENTRUM s.r.o. , having its registered seat at Mlynské Nivy 16, 821 09 Bratislava – mestská časť Staré Mesto, IČO: 31 396 224, legal form: joint- stock company, for the purpose of ensuring the provision of the More by HB Reavis.
<u>In every country:</u>
HID Global Corporation , 611 Center Ridge Dr, Austin, Texas 78753, United State of America – as separate controller ensuring the HID Mobile access card services.
HB Reavis Investments Slovakia s. r. o. , with its registered office at Mlynské Nivy 16, 821 09 Bratislava, ID number: 44 489 650, legal form: limited liability company registered in the Commercial Register of the District Court Bratislava I, section: Sro, file number: 55375 / B as provider of the More by HB Reavis sublicences
Symbiosy s. r. o. , with its registered office at Mlynské Nivy 16, 821 09 Bratislava, ID number: 52 218 546, legal form: limited liability company registered in the Commercial Register of the District Court Bratislava I, section: Sro, file number: 134990/B, as provider of the More by HB Reavis licences
In addition to the companies listed above, we use the following categories of intermediaries: data centres, IT service providers, concierge service providers, companies providing waiter/ waitress services, hosting,

marketing tools, analysis, tracking tools, events, surveys, business operations / management tools, task management and communication tools.

At the same time, in connection with services provided/facilitated through More by HB Reavis, personal data may be disclosed to entities that supply or are involved in supplying you with the goods or services ordered, to the extent necessary to achieve the purpose(s) defined above.

We use analytical and marketing tools (e.g. Google Analytics, Facebook Pixel, LinkedIn Pixel, Hotjar, Luigi's Box, HubSpot) that collect third-party cookies. The information about your use of websites (including your IP address) generated by the cookies will be transmitted to and stored by the above-mentioned companies also on servers in the United States. We will use this information for the purpose of evaluating your use of the website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. These companies will not associate your IP address with any other data held by them. You may refuse the use of cookies by selecting the appropriate settings on your browser. However, please note that if you do this you may not have full functionality of this website. By using our websites, you acknowledge that the above – mentioned companies may process data in the manner and for the purposes set out above.

From whom do we get the personal data?

We get personal data from you.

Do we use automated individual decision-making?

Some functionalities of the Workplace Insights and My Office Life process data in a way that is consistent with profiling (analysis of data, not predicting Data Subjects behaviour) under the Regulation; this is to be able to deliver functionalities such as find ideal space and temperature voting. Without such processing, the Controller would not be able to deliver the full functionality to the Data Subject and not able to help provide Data Subjects with tools and insights to possibly take better advantage of the workspace. The information within the functionality is delivered exclusively to the Data Subject and the Controller has adopted solutions to properly secure the Data Subjects data in line with market standards. Therefore, we do not perceive this processing itself to pose any significant effects on the Data Subject as it is not shared with the Data Subjects employer or independent third parties.

Do we transfer your personal data to third countries?

Your personal data are processed within the territory of the European Union or UK. 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).

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 or UK 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
- To 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?

Electronically: dataprivacy@hbreavis.com

In writing to the address: HB Reavis Investments Slovakia s. r. o., to att.: Compliance department, Mlynské Nivy 16, 821 09 Bratislava, Slovak Republic

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 or UK 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

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

or for UK at:

<https://www.gov.uk/data-protection/make-a-complaint>