

The main goal of **Europa Investment Property CZ a.s.** is to grow the value of your investments and protect your assets, but also to guard your privacy. If you are our customer, news subscriber or website visitor, you will be sharing with us your personal data. We are responsible to ensure the protection and safety of these data. Please inform yourselves about the protection of personal data, the principles and rights you have in relation to the GDPR (General Data Protection Regulation).

Via the forms available on this website you can provide us with basic personal information; before doing so, please read also the Terms of Use. By providing personal data the provider – data subject – expresses his/her consent with the processing of these data by the data controller – i.e. **Europa Investment Property CZ a.s.**

According to Act No. 101/2000 Coll., on Personal Data Protection, we are the controller of your personal data that you provide us. Where used below herein the term “controller” shall mean the following data controller: **Europa Investment Property CZ a.s.**, Jindřišská 901/5, Prague 1, 110 00, Company ID No.: 06600204, info@europaproperty.org, tel. +420 222 703 253.

We declare that as the controller of your personal data we meet all legal requirements set by the applicable legislation, especially the Act on Personal Data Protection and the GDPR, i.e. that:

- we will be processing your personal data only on the basis of a valid legal reason, especially a legitimate interest, performance of a contract, a legal obligation or given consent,
- according to Article 13 of the GDPR, we fulfil the information obligation prior to the beginning of personal data processing,
- we will enable you and we will support you in the exercise and fulfilment of your rights according to the Act on Personal Data Protection and the GDPR.
- **Legal basis for processing**
- Customer Services Agreement
- The provision of personal data is the data subject’s obligation that arises under the above-mentioned agreement.
- The provision of personal data is the data subject’s obligation that arises on the legal basis of the performance of the legal obligation of Europa Investment Property CZ a.s. in accordance with Regulation (EU) 2015/847 of the European Parliament and of the Council on information accompanying transfers of funds, Directive (EU) 2015/849 of the European Parliament and of the Council on the prevention of the use of the financial system for the purposes of money laundering or terrorist financing and Act No. 253/2008 Coll., on Selected Measures against Legitimization of Proceeds of Crime and Financing of Terrorism
- Personal data is also provided on the legal basis of the performance of the legal obligation set by other statutory provisions
- The provision of personal data in the case of sending newsletters is based on a given consent
- **Purposes and scope of personal data processing**
Provision of data under a contract signed with the Client
- **Provision of services and performance of contract – your** personal data including your name and surname, account number, invoicing details, e-mail, telephone or, if appropriate, address of service, ID number, birth certificate number and permanent residence are necessary for us to perform contracts (e.g. subscription and purchase of bonds, sale and lease of own real estate properties, etc.)
- **Sending newsletters – your** personal data (e-mail and name), gender, what you click on in e-mail and when you most often open your e-mails is used by us for sending commercial communications related to

a signed contract. As a customer you are thus supplied with news concerning the activities of Europa Investment Property CZ a.s. for a period of 5 years from the last order or expiration of the contract. If you are not our customer, we will be sending you newsletters only on the basis of your consent which can be withdrawn at any time according to the GDPR regulation by using the unsubscribe link in every e-mail sent. If we come across any interesting works by someone else, we will be glad to recommend these works by e-mail. In both cases, you can withdraw this consent by using the unsubscribe link in every e-mail sent.

- We will store your personal data for the duration of the limitation periods, unless law stipulates a longer period for their storage or unless we specify otherwise on a case-by-case basis.
- We will start to process personal data for you from the moment when you enter the first piece of personal data into one of our applications. Please note that this also applies to the contact forms provided on our website.
- We will be processing personal data as long as the Agreement between you and us is in force (even if you don't pay for the Services).
- We will process personal data both manually and by automated means.
- We promise that we will be processing personal data with professional care.
- We undertake that we will store and process personal data safely and that we will use all the reasonable security systems and procedures typical for personal data processing.

Cookies

When you browse our website, we record your IP address, the time you spent on our website and from which website you have come. We consider the use of cookies to measure website traffic and adjust the display of the website to be our legitimate interest of a controller because we trust that this allows us to offer you even better services.

Cookies for ad targeting will be processed only on the basis of your consent. Our website can also be browsed in a mode that does not allow any collection of personal data. You can disable the use of cookies on your computer in your Web browser.

On our website www.europaproperty.org we use the following functions:

Google Adwords, Google Analytics, Sklik, IP address tracking, Remarketing, Affinity Audiences, In-Market Audiences, Demographic and Geographic Targeting. Google Analytics demographics & interests reports. The goal is to ensure better targeting of ads at users with specific interests. Third party suppliers, including Google, display the ads of ZENRON and Europa Investment Property CZ a.s. on various websites.

Third party suppliers (including Google) use cookies to display ads on the basis of the user's previous visits on the website www.europaproperty.org.

Your personal data will be handled only in the manner conforming to the applicable provisions of the GDPR regulation and solely for the following purposes: keeping archives according to law, offering deals or services to data subjects, contacting the data subject with an offer for cooperation, contacting the data subject with a contest organized by the data controller.

The data controller may provide any available information about you to law enforcement authorities.

Unsubscribing from newsletters and commercial communications

We send you e-mails with inspiration, articles or products and services if you are our customer on the basis of our legitimate interest.

If you are not our customer yet, we will send you these e-mails only with your consent. In both cases, you can unsubscribe from our e-mails by using the unsubscribe link in every e-mail sent.

Confidentiality

We would like to assure you that our employees and associates who will be processing your personal data are obligated to maintain confidentiality about personal data and about security measures the disclosure of which would threaten the safety of your personal data. This confidentiality obligation shall also apply after the termination of our contractual relationship with you. Without your consent, your personal data will not be disclosed to any other third party.

Safety

www.europaproperty.org adopts technical and organizational safety measures to protect all the data kept by us against tampering, misuse or loss. Security measures are regularly updated and innovated. We protect personal data to the maximum extent possible by using modern technologies which reflect the current state of the art. We have adopted and maintain all the possible (currently known) technical and organizational measures to prevent misuse, damage or destruction of your personal data.

Transferring personal data to third parties

The controller will not provide access to personal data to third parties and uses these data only for its own purposes to the defined scope.

Your personal data can be accessed by all our employees, associates and partners who are bound by confidentiality and are trained in the safety of personal data processing.

Our employees are bound by confidentiality and by agreements on non-disclosure and non-sharing of information with third parties and any breach is subject to a significant penalty.

Personal data recipients

- Public authorities (e.g. courts, regulatory bodies) banks and financial institutions
- Information system maintenance providers
- Other recipients according to the client's needs and instructions
- For the purposes of carrying out some specific processing operations that we are not able to carry out ourselves, we use the services and applications of processors who specialize in such processing and are compliant with the GDPR regulation according to an agreement on personal data processing.

These include the following processors:

- Europa Investment Property CZ a.s.
- ZENRON SERVICE LTD
- Facebook.cz
- Google.cz
- Seznam.cz

It is possible that in the future we will decide to use other applications or processors to facilitate and improve the quality of processing. However, we promise you that in such a case during the selection process we will place on processors at least the same demands for safety and quality of processing as those we place on ourselves.

Period of personal data processing

We will be processing personal data for the period equal to the term of the signed contract (Agreement) and after the expiry of this term we will handle these data according to the applicable legislation, esp. Act No. 499/2004 Coll. (Act on Archiving and Records Management and on the Amendment of Selected Acts) and 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 (the GDPR regulation).

We will store your personal data for the duration of the limitation periods, unless law stipulates a longer period for their storage or unless we specify otherwise on a case-by-case basis.

- We will start to process personal data for you from the moment when you enter the first piece of personal data into one of our applications, including the contact forms on our website. This act will launch the actual contractual process aimed at entering into a contract. If no contract is signed, the data provided, unless you give your consent, will be deleted.
- We will be processing personal data as long as the Agreement between you and us is in force (even if you don't pay for the Services).
- The personal data for the processing of your request in connection with the protection of personal data are kept by us for a period of five years to document this fact and to protect the controller's rights.
- We will process personal data both manually and by automated means.
- We promise you that we will process personal data with professional care in connection with the implementation of the GDPR regulation into our corporate internal system on the basis of a gap analysis.
- We undertake that we will store and process personal data safely and that we will use all the reasonable security systems and procedures typical for personal data processing.

Your rights in connection with the protection of personal data

You have a number of rights in relation to the protection of your personal data. If you wish to use any of these rights, please contact us by e-mail at: info@europaproperty.org based on the enclosed application form

- **The right of access** (Art. 15 of the GDPR) to personal data means that from the controller – i.e. **Europa Investment Property CZ a.s.** you can obtain information on whether the controller processes your personal data and if yes, what type of data it is and how these data are processed. We will document the foregoing to you within a period of 30 days. You also have the **right to demand that the controller, i.e. Europa Investment Property CZ a.s., without undue delay, correct inaccurate personal data** (Art. 17 of the GDPR) related to you. **If any personal data are incomplete or outdated, you have the right to complete them at any time.**
- **The right to deletion** of personal data (Art. 17 of the GDPR) constitutes, in other words, the obligation of the controller – i.e. **Europa Investment Property CZ a.s.** to dispose of the personal data that the controller processes about you, if certain conditions are met and if you request so. We do not want to forget about you, but if you wish, you have the right. In this case, we will delete all your personal data from our system and from the systems of all sub-processors and from all backups. We need 30 days to secure the right to erase.
- In some cases, we are bound by a statutory obligation, and for example, we have to record issued tax documents for a period stipulated by law. In this case, we will thus delete all the personal data that are not subject to any other law. Once the deletion is completed, we will inform you by e-mail.

- You also have the **right to demand that the controller** – i.e. **Europa Investment Property CZ a.s.** in some cases **restrict the processing** of your personal data (Article 18 of the GDPR). (E.g. by unsubscribing from the newsletter you restrict the purpose of processing for the sending of commercial communications.) You have the **right to object** at any time against any processing that is based on the legitimate interests of the controller – i.e. **Europa Investment Property CZ a.s.** or of a third party or is necessary for the performance of a task carried out in the public interest or in the exercise of an official authority.
- **The right to data portability** (Article 20 of the GDPR) gives you an option to obtain the personal data that you disclosed to us and to our controller – i.e. **Europa Investment Property CZ a.s.** in a commonly used and machine-readable format. We can subsequently transfer these data to another controller or, if technically feasible, on the basis of your request.
- You can exercise the right to object to personal data processing (Article 21 of the GDPR) at any time by email at info@europaproperty.org. Please kindly specify the situation that leads you to the conclusion that the controller should not process the data.
- The right to withdraw at any time the consent to personal data processing shall not be exercised, except for the consent to the sending of **newsletters**, because your personal data are processed because of the performance of a contract with you, and not on the basis of a consent with processing.
- **Complaint with the Office for Personal Data Protection**
In the event that you are not satisfied with the processing of your personal data by our controller – i.e. **Europa Investment Property CZ a.s.**, you may file a complaint directly with us or you may **refer the matter to the Office for Personal Data Protection**. We will be very pleased if you first inform us about any such suspicion so that we can do something about it and correct any mistake.
- For more information about the client's rights, see the website of the Office for Personal Data Protection. (<https://www.uoou.cz/6-prava-subjektu-udaj/d-27276>)

Should you have any questions, feel free to contact us: info@europaproperty.org

