

VGP Privacy Notice for tenants (Slovakia)

The protection of your personal data is important to us. If you or our contractual partner provide us with personal data, it will be processed in accordance with the applicable data protection law, in particular the General Data Protection Regulation (GDPR).

With this Privacy Notice, we are informing you about the processing of your personal data in connection with the conclusion and execution of the tenancy and the rights to which you are entitled as a data subject in this respect.

I. Scope of application and terminology

This data protection information applies to the processing of personal data by the companies of the VGP Group in the context of the initiation, conclusion and execution of tenancies with (potential) tenants of the properties of the VGP Group. Regarding the terms used (e.g. "personal data", "processing", "controller"), we refer to the definitions in Art. 4 GDPR.

For commercial tenants, we kindly ask you to provide this data protection information also to those persons within your organization or company who are involved in the execution of the contract and communication with us.

II. Controller, contact, data protection officer

The property is owned and leased by the VGP landlord company specified in the heading of your lease agreement ("**Lessor**"), whereby VGP – *industriálne stavby s.r.o.* (the "**Property Manager**") is responsible for facility and property management on behalf of the Landlord. These companies are therefore responsible for the processing of your personal data within the meaning of Art. 4 No. 7 GDPR. The contact details of the landlord can be found in the lease agreement.

The contact details of VGP – *industriálne stavby s.r.o.* are Suché myto 1, Bratislava - mestská časť Staré Mesto 811 03, e-mail: info@vgpparks.eu, tel.: +421 908 110 002.

The primary contact for all data protection concerns or questions in connection with the rented property is the Property Manager. However, you can also contact the Lessor at any time.

III. Data categories and origin

We process personal data of representatives and contact persons of our (potential) tenants to the extent necessary for the conclusion, execution and handling of lease agreements. This is usually the following data:

- First and last name, business contact details, position, tenant/company affiliation, communication data and content

(e-mails, written correspondence, etc.) as well as any personal data contained in contract and billing documents and register/credit checks.

Generally, we receive this data directly from you or from our contractual partner. However, it may also be necessary for us to collect information about tenants from publicly accessible sources (e.g. public registers, credit agencies, Internet) as part of the tenancy. The provision of this data is necessary for the execution of the tenancy, communication with the tenant's contact person and for processing tenant inquiries and concerns. If the data is not provided to us, we may not be able to enter into a contractual relationship with the potential tenant or fulfill our contractual obligations.

IV. Purposes and legal basis for the processing of personal data

Your data will be collected and processed primarily to establish and execute the tenancy agreement with the tenant and to fulfill the associated reciprocal obligations and rights. This includes the following purposes in particular:

- Pre-contractual measures (e.g. pre-contractual communication with the tenant's contact person)
- Obtaining credit reports and credit checks before concluding the contract to check the tenant's creditworthiness (ability to pay) and assess the financial default risk
- Contract fulfillment and processing including administrative implementation of the tenancy (in particular tenant/property management, contact data management in the electronic address book and CRM system, rent accounting, documentation of the rental process, maintenance/replacement of the rental properties, communication with the property management and, if applicable, you)
- Fulfillment of public law obligations (e.g. from reporting, commercial and tax law)
- If necessary, assertion of legal claims and defense in legal disputes in connection with the tenancy and exercise of domiciliary rights

The legal basis for the processing is **Art. 6 para. 1 sentence 1 lit. b GDPR** or - if you are not our tenant and contractual partner, but your employer or client, for example - **Art. 6 para. 1 sentence 1 lit. f GDPR**. We have a legitimate interest in processing the data required for the initiation and fulfillment of the contract of those persons who are not our contractual partners themselves, but who represent them vis-à-vis us and participate in the fulfillment of the contract. Insofar as we also process your data to fulfill legal requirements, e.g. from reporting, commercial and tax law, the legal basis is **Art. 6 para. 1 sentence 1 lit. c GDPR**.

In addition, we process your data insofar

as this is necessary to protect the legitimate interests of our company or a third party and we can assume that you have no overriding interest in us not processing this data for these purposes. Our legitimate interests include

- Forwarding of contact data to service providers (e.g. tradesmen) for the coordination and scheduling of necessary maintenance and repair work on the rented property;
- Central contact data/contract management in shared IT systems (e.g. CRM) within the group of companies within the legally permissible framework (need-to-know principle) due to our need for efficient group-wide rental, property and contact management;
- the disclosure of relevant tenant data in the event of an imminent sale of the real estate property (in particular in a due diligence process) to the extent permitted by law and absolutely necessary, whereby personal tenant data is anonymized or pseudonymized where possible.

The legal basis for the processing is **Art. 6 para. 1 sentence 1 lit. f GDPR**; our legitimate interests arise from the aforementioned purposes.

V. Duration of storage

We generally store personal data only for as long as is necessary for the respective processing purposes and for the fulfillment of legal and contractual obligations. Longer storage may be necessary in individual cases, for example for evidence and documentation purposes with regard to statutory limitation periods. Accordingly, we delete or destroy contract-related documents and the personal data contained therein at the latest when the contractual relationship has ended, all mutual legal claims have been fulfilled or can no longer be asserted (i.e. at the latest after expiry of the limitation periods) and there are no longer any statutory retention obligations (in particular for tax and accounting reasons) or other statutory justifications for storage.

VI. Recipients of your data

It may be necessary for us to pass on your data to other companies, authorities and bodies for the proper execution of the tenancy:

- Affiliated companies (for example VGP N.V., VGP – *industriálne stavby s.r.o.* and other), external service providers or other contractors that we use for rental and property management (e.g. facility management companies, tradesmen, cleaning companies, experts);
- Necessary data transfers to authorities and public bodies such as courts, financial and administrative authorities (e.g. in the context of legal disputes);
- Third parties involved in the business transaction, such as credit institutions,

providers of payment services, postal/telecommunications service providers;

- IT and web service providers commissioned to support our internal IT infrastructure;
- Lawyers, tax consultants, estate agents, insurance companies (e.g. building insurers, liability insurers), potential buyers of real estate and investors.

If service providers come into contact with your data on our behalf, we take contractual, technical and organizational measures to ensure that they comply with the applicable data protection regulations and only process your data on our behalf and in accordance with our instructions. We do not intend to transfer personal data to recipients in third countries or to international organizations. Should a transfer to recipients in third countries or to international organizations be necessary, this will only take place in accordance with Art. 44 ff. GDPR or if the data subject has given us their consent.

VII. Rights of the data subject

In connection with the processing of personal data, you as the data subject are entitled to the following rights under the GDPR. To exercise your rights, you can contact us at any time using the contact details above, stating your application or request (see section 2).

Right of access: In accordance with Art. 15 GDPR, you have the right to request information at any time as to whether we are processing your personal data and, if so, which data we are processing. If we process your personal data, you can also request information about the information listed in Art. 15 (1) and (2) GDPR and a copy of the data (Art. 15 (3) GDPR). The restrictions on the right of access, in particular pursuant to Art. 15 para. 4 GDPR and § 21 (4) of the Personal Data Processing Act should be noted.

Right to rectification: In accordance with Art. 16 GDPR, you can immediately request the correction of incorrect or incomplete personal data stored by us.

Right to erasure: In accordance with Art. 17 GDPR, you can request the erasure of your personal data stored by us, unless the processing is necessary for compliance with a legal obligation or for the establishment, exercise or defense of legal claims. The further restrictions of Art. 17 para. 3 GDPR and § 23 (4) of the Personal Data Processing Act should be noted.

Right to restriction of processing: In accordance with Art. 18 GDPR, you can request the restriction of the processing of your personal data. In this case, your data - apart from its storage - may only

be processed with your consent or under the conditions of Art. 18 para. 2 GDPR.

Right to data portability: Under the conditions of Art. 20 GDPR, you have the right to receive the personal data we have stored about you, which you have provided to us, in a structured, commonly used and machine-readable format or, where technically feasible, to request that it be transmitted directly to another controller. However, this only applies if we process the personal data on the basis of your consent or on the basis of a contract or contract negotiations with you and the processing is carried out using automated procedures. The further restrictions, in particular according to Art. 20 para. 3, 4 GDPR, should be noted.

Right to withdraw: If the processing is based on your consent, you also have the right to withdraw your consent at any time (see Art. 7 (3) GDPR for details); the withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.

RIGHT TO OBJECT:

IF WE PROCESS YOUR PERSONAL DATA FOR THE PURPOSES OF OUR LEGITIMATE INTERESTS PURSUANT TO ART. 6 ABS. 1 S. 1 LIT. F GDPR OR ON THE BASIS OF A PUBLIC INTEREST PURSUANT TO ART. 6 ABS. 1 P. 1 LIT. E GDPR, YOU HAVE THE RIGHT UNDER ART. 21 GDPR TO OBJECT, ON GROUNDS RELATING TO YOUR PARTICULAR SITUATION, AT ANY TIME TO PROCESSING OF PERSONAL DATA CONCERNING YOU. IN THE EVENT OF A JUSTIFIED OBJECTION, WE MUST REFRAIN FROM ANY FURTHER PROCESSING OF YOUR DATA, UNLESS IT IS NECESSARY FOR COMPELLING REASONS WORTHY OF PROTECTION THAT OUTWEIGH YOUR INTERESTS, RIGHTS AND FREEDOMS OR FOR THE ASSERTION, EXERCISE OR DEFENSE OF LEGAL CLAIMS. THE RIGHT TO OBJECT IS SUBJECT TO THE RESTRICTIONS OF § 30 OF PERSONAL DATA PROCESSING ACT.

IF YOUR PERSONAL DATA IS PROCESSED FOR THE PURPOSES OF DIRECT ADVERTISING, YOU HAVE THE RIGHT TO OBJECT TO THE PROCESSING OF YOUR DATA FOR SUCH ADVERTISING PURPOSES AT ANY TIME WITHOUT RESTRICTION. IN THIS CASE, IT IS NOT NECESSARY TO SPECIFY A PARTICULAR SITUATION. IN THE EVENT OF YOUR OBJECTION, PROCESSING FOR THE PURPOSES OF DIRECT ADVERTISING WILL CEASE IMMEDIATELY.

THE OBJECTION CAN BE SENT FREE OF CHARGE AND IN ANY FORM (E.G. BY E-MAIL, FAX OR LETTER) TO THE POSTAL ADDRESS STATED UNDER NO. 2 ABOVE. THERE ARE NO COSTS OTHER THAN A FEW TRANSMISSION COSTS ACCORDING TO THE BASIC RATES.

VIII. Complaint to the competent data protection authority

If you believe that the processing of your personal data by us violates data protection regulations, you also have the right to file a complaint with a data protection authority, in particular in the Member State of your habitual residence, place of work or place of the alleged infringement in accordance with Art. 77 GDPR.

Status: January 2024