

INFORMATION MEMORANDUM

Information on the Protection of Personal Data in the Companies of Sekyra Group

The Sekyra Group companies take care of the protection of your personal data and have a commitment to protect such data in accordance with the principle of transparency, ethical information procedures and applicable data protection laws, including the Regulation (EU) 2016/679 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 (General Data Protection Regulation – hereinafter the "GDPR").

As a proof of our commitment to the protection of personal data, we have prepared and approved a set of binding business policies containing rules that regulate our commitment to the protection of personal data, including the principles of transfer of personal data and the related individual privacy rights.

The aim of regulation of handling of personal data

Our aim is to ensure maximum protection of your personal data in the course of their processing by us. Notwithstanding whether you have entrusted your personal data to us under a contract or on the basis of your consent, or whether we have obtained them under the laws that order us to do so, our procedure used in their protection honours the same rules:

- 1) minimising their necessary scope,
- 2) protecting them and controlling access to them,
- 3) deleting them if they are no longer updated and needed.

1. Subject-matter:

This document explains the method of collection and use of personal data by the Sekyra Group companies listed in the annex to this Memorandum (hereinafter the "**Sekyra Group**"), and rights of subjects of such data.

Personal data means any information relating to an identified or identifiable natural person ("data subject"); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

We collect personal data by various methods in the course of ordinary business activities, both on-line and offline. Data are gathered, for instance, in the course of provision of services, execution of contracts, communication with the Sekyra Group companies, or during visits to or use of our website. We also receive personal data from our clients for the purpose of provision of services on their behalf.

2. Data Controller's identity:

For the purpose of this Memorandum, personal data controllers in the Sekyra Group are companies included in the list of companies in the annex to this Memorandum, which jointly determine the purposes and means of processing of personal data and are therefore considered as joint controllers pursuant to Art. 26 of the GDPR (hereinafter jointly the "**Joint Controllers**" or each of the individually the "**Controller**").

The chief controller responsible for the performance of the Sekyra Group's duties in connection with the processing of personal data, particularly with regard to the exercise of data subjects' rights and the obligation to provide information in accordance with the GDPR, is **Sekyra Group**, **a.s.**, Company ID No. 63998611 (hereinafter "**Sekyra Group**, **a.s.**").

If you wish to communicate with any of the Sekyra Group companies in connection with the processing of personal data or with such company's activities, you can contact:

Sekyra Group, a.s.

U Sluncové 666/12a 180 00 Prague 8 – Karlín Tel: +420 234 005 688 E-mail: gdpr@sekyragroup.cz

3. Personal data categories:

The date that may be gathered and processed by us include:

- contact information, which enables us to communicate with you, such as your name, surname, date of birth, birth index number, residence address, telephone number, e-mail address or other addresses that will enable us to send you messages, company information and registration data you will provide to us;
- other data included in job applicants' CVs (education, skills, work experience, family status, etc.);
- information concerning relations that will help us do business with you, such as types of products and services in which you may be interested;
- transaction information relating to the method used by you in dealing with us, including purchases, enquiries, customer account information, ordering and contact information, invoicing details and financial data, underlying taxation data, transaction history and correspondence and information regarding the method of your use of our website (i.e. the Sekyra Group's website www.sekyragroup.cz).

4. Legal basis for processing:

Each Controller may process your personal data solely for purposes in respect of which they have the relevant legal basis for processing. With regard to the activities carried on by the Controllers and the purposes for which they process your personal data in connection therewith, the following can be considered as the legal basis of the processing of personal data:

- your consent;
- if necessary for the performance of contracts with the Controller's customers, employees and suppliers or in order to take steps at the request of a customer, client or employee prior to entering into a contract (selection of an appropriate applicant for entering into an employment agreement or into another labour contract or agreement);
- if necessary for compliance with a legal obligation of the Controller;
- for the protection of the rights and legitimate interests of the Controller, its partners and the other Joint Controllers.

The provision of personal data is always voluntary (with the exception of the rights and legitimate interests of the relevant Controller). If, however, you refuse to provide your personal data to us for the purposes of processing that have another legal basis than your consent, it will not be possible for us to execute the contact with you or to fulfil any of your other requirements because the provision of personal data for such purposes is a necessary prerequisite for the execution and performance of the contract or for the fulfilment of the requirements by the relevant Controller.

Your consent with the processing of personal data for marketing purposes is always subject to your absolute discretion and you may withdraw it at any time free of charge; however, the withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

5. Purposes of processing:

- Performance of contracts and provision of services.
- Administration of our contractual obligations and of your ongoing relationship with us, provision of information about our products or services, as well as about special offers and advertising events.
- Ensuring security of our website, networks, systems and protection of our companies from fraud.
- Marketing, the development and improvement of Sekyra Group's products and services, and distribution of newsletters and information about our products that may be relevant for you.
- Management of our everyday business needs, such as the processing of payments and administration
 of financial accounts, product development, contract management, administration of our website,
 company management, audit, reporting and compliance with the laws.

Any data processed by us will be used solely for the purpose for which they have been obtained and based on your consent or on any of the above-mentioned legal bases for processing.

6. Recipients of personal data:

In principle, the Joint Controllers do not share your personal data with any other personal data controllers (with the exception of sharing among the Joint Controllers), unless they are obliged or authorised to do so under the law or with your consent.

Sharing of personal data with data processors does not require your consent. We always carefully check the subjects that are to become processors of the data administered by the relevant Controller and see that they comply with adequate technical and organisational measures. We execute a written personal data processing contract with each subject that could become, as a part of its business activities, a processor of personal data administered by us, and such processor may only handle the personal data to the extent necessary for the performance of its task, for the purpose of performance of its task and for the agreed period.

- **Suppliers (third parties):** We may use third parties for the provision of our services or performance of our functions on your behalf. We may disclose any personal data to third parties solely for the purpose of provision of such services and in your interest or for the purpose of implementation of a contractual or licensing relationship. A written personal data processing contract is executed with each third party so that all processing of such personal data is carried out in accordance with our instructions and complies with the original purposes. Our suppliers include, without limitation:
 - Marketing agencies
 - Providers of IT services
 - Providers of bookkeeping and payroll services
 - Law firms
 - Providers of shredding and archiving services
 - Independent auditors
 - Financial and banking institutions or other creditors providing funding to developer projects.
- Based on the requirements of the laws: We may also disclose personal data to public and judicial authorities, law enforcement authorities and agencies to the extent required by the law. In cases where it is permissible under the law, we may also provide such data to third parties (including legal counsel) if necessary for proving, assertion or protection of legal claims or for other promotion of our rights, protection of our property or of rights, property or security of other persons, or as required by the performance of an independent audit, and for the compliance with business management rules and functions.
- Mergers and acquisitions: The personal data may be transferred to the party that acquires all or a
 part of the relevant Controller's equity, assets or business operations in case of any sale,
 amalgamation (merger), liquidation, split or otherwise.
- **Sekyra Group companies:** Such data may be also transferred by the Controller to the other Sekyra Group companies, particularly to Sekyra Group, a.s., as the chief responsible Controller (see above) and personal data processor, or may be shared with them in compliance with applicable laws.

7. International transfers:

The Joint Controllers of the Sekyra Group do not transfer any personal data to third countries.

8. Your rights:

You may ask any Controller, particularly Sekyra Group, a.s., for information about the processing of your personal data, and we will be obliged to provide to you without undue delay the information concerning

- the purpose of the processing;
- the processed personal data or their categories, including all available information about their source;
- the recipient or categories of recipients;
- the nature of any automated processing if the data are used for the determination of data subjects' rights.

Request for explanation / removal of an unlawful condition: If your believe or find out that we process your personal data in conflict with the protection of your private and personal life or in conflict with the law, you have the right to ask for explanation and/or call upon us to remove such unlawful condition, i.e. to erase your personal data, to restrict the processing of your personal data, or to object to the processing, and the right to portability.

Consent and its withdrawal:

Sekyra Group processes your personal data for marketing purposes solely on the basis of your consent. By knowingly providing your personal data to any of the Sekyra Group companies, you acknowledge and agree with gathering and processing of such data, their transfer abroad and their use, as specified in this document. In cases where it is required by applicable laws, you will be asked for your consent.

Withdrawal of the consent: You may withdraw your consent with such processing at any time free of charge; however, the withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal. At the same time, the withdrawal of your consent will not have any impact on our contractual relationship.

Exercise of the above-mentioned rights: For addressing us, please use the contact data specified below:

Sekyra Group, a.s.

U Sluncové 666/12a 180 00 Prague 8 – Karlín Tel: +420 234 005 688

E-mail: gdpr@sekyragroup.cz

In case of a breach of our obligation you can also address your complaints to the Office for Protection of Personal Data (the "Office"), registered office Pplk. Sochora 27, 170 00 Prague 7, tel.: 234 665 111 (switchboard). The Office also operates its website: www.uoou.cz, where you can find further information as to the matters with which and the method how the Office can help you.

9. Shares in the responsibility of the Joint Controllers in Sekyra Group

The Sekyra Group companies as the Joint Controllers of personal data have executed among themselves, in accordance with Art. 26 of the GDPR, an agreement specifying their respective shares in the responsibility for the performance of obligations arising from the GDPR.

The chief personal data Controller responsible for the performance of the obligations of the Joint Controllers in the Sekyra Group is Sekyra Group, a.s., which performs particularly the obligations relating to the exercise of data subjects' rights and to the provision of information on the processing of personal data that is specified in this Memorandum. Sekyra Group, a.s. is also the chief Controller responsible for communication with the supervisory authority.

Sekyra Group, a.s., as the chief processor, ensures for the rest of the Sekyra Group members the technical, staffing and security measures applicable to the handling of personal data. In particular, Sekyra Group, a.s. is fully responsible for the performance of the obligations corresponding to data subjects' rights to access to their personal data, their rectification, erasure, restriction of their processing, the portability of personal data and objecting to their processing.

Individual Controllers then fulfil, in particular, the information duty directly related to the data subjects who conclude contracts with the relevant company or provide their personal data to such company on another basis.

The Joint Controllers hereby inform the data subjects that they **may exercise their respective rights under the GDPR with or vis-à-vis any of these Controllers**. We recommend, however, addressing any requests or suggestions to Sekyra Group, a.s., or to the relevant Controller with which the subject has entered into a contract or to which the personal data have been provided or have been otherwise obtained by it.

10. Keeping of personal data:

Any personal data will only be kept for the period necessary for the purposes for which they have been gathered, usually for the period of duration of any contractual relationship, and then for the period required or permitted by applicable laws, and for the necessary period in the case that we would have to present evidence in judicial or administrative proceedings, but at all times no longer than until the expiration of the relevant limitation periods specified by the law.

Any personal data processed with your consent for marketing purposes will be processed for the period in respect of which you have granted to us your consent, or until withdrawal of your consent.

In accordance with the minimisation principle, we always process only personal data which we need for the relevant purpose and keep them for the necessary period. Immediately after the expiration of such period, the personal data are erased or pseudonymised.

11. Protection of personal data:

Security measures for the protection of personal data: the Sekyra Group applies adequate technical, physical and organisational measures that are proposed to ensure reasonable protection of personal data from accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal data or other forms of unlawful processing. The access to personal data is limited to authorised recipients who need to know them. We also apply expanded security measures in the processing of any sensitive personal data.

We disclose or transmit personal data solely in accordance with customer instructions or for the purpose of provision of the required services. Unless specified otherwise by the customers, we handle personal data processed by us on behalf of our customers in accordance with our obligations relating to the disclosure and transfer of data specified in this document.

All persons who come into contact with personal data due to their position at work (or under obligations assumed by a contract) are trained and are bound by the obligation of confidentiality.

12. Our website:

Cookies, use of the data and other similar tools

When you visit our website (www.sekyragroup.cz), we may automatically gather certain information by means of such technologies as cookies and tools for web browser analytics. In a number of cases, the information collected by means of cookies and other tools is used by an unidentifiable manner without any reference to personal data.

Cookies are small text files saved by the website during visit via the browser to the hard disk of the computer or other device. We may use cookies to accommodate browsing preferences and to improve the functioning of our website. Cookies may be used to manage the performance and gathering information on the manner of use of our website, for analytical purposes. They can be also used to manage the function and to increase the effectiveness of the user's visits, e.g. by remembering the language selection, passwords and logon data. There are two kinds of cookie files: session cookies, which are removed from your device after leaving the website, and permanent cookies, which remain in your device for a longer time or until manually removed.

We may use Flash cookies (also known as local shared objects) and similar technologies to personalise and to improve your on-line user experience.

Adobe Flash Player is an application allowing quick development of a dynamic content, such as video clips and animations. We use Flash cookies for security reasons and for saving of settings and presets, like in the case of browser cookies. However, these files are administered by an interface other than the interface provided by your browser. Information about the administration of Flash cookies can be found on Adobe's website or on www.adobe.com. We may use Flash cookies and similar technologies for purposes based on behaviour, or for displaying interest-based advertising.

The protocol files obtained from our servers may collect information on the manner of use of our website by users (the information on use). Such data include, among others, the user domain name, language, browser type and operational system, information about the web service provider, the IP (internet protocol) address, location or link from which the user passed to the relevant website, the web you visited before arriving at our website and the website you will visit after leaving our website, as well as the time spent by your visit of our website. The information on use of the website can be monitored and used by us for the assessment of the performance and activities of our website, for the improvement of its design and functions or for security reasons.

You can change your browser's settings to block received cookies, to notify you of their receipt or to delete them. You can also browse through our website by means of an anonymous browser profile. Further information on alterations or changes of browser settings can be found in your browser's manual or help. If you disagree with the use of cookies or similar technologies that store information in your device, you should change your browser settings accordingly. Please be advised that some of our website functions need not operate correctly if you prohibit receipt of cookies or such technologies.

Where required by applicable laws, you will be asked to grant consent with receipt of certain cookies or similar technologies before we use them or save them in your computer or other similar device.

- Linked websites: We may provide on our website links to websites operated by third parties ("linked websites"). Our company is not obliged to assess, control or examine any linked websites. Every linked website may have its own conditions of use and declaration on the protection of personal data. While using the linked websites, users should get familiar and comply with such conditions. We are not responsible for the principles and procedures used by any linked websites and any other links located on such websites. Such links do not represent our approval of the linked websites or of any company or service. We recommend users to get familiar with the conditions and relevant documents of such linked websites before using them.
- **Children:** Our website is not children-oriented. We do not use it to knowingly obtain personal data from children or for sale to children. If we find that a child has provided his/her personal data via one of our websites, we will remove such data from our systems.
- Google Analytics: Google Analytics, which is used to monitor visitor rate of a website, collects anonymous data of website visitors. Details of the use of the Google Analytics service can be found here: http://www.google.cz/analytics/terms/cz.html. Further information concerning the data collected by Google Analytics can be found at http://www.google.com/intl/en/analytics/privacyoverview.html. You may block these cookies by the relevant browser settings. If you do so, you may not be able to make full use of the functions of our websites. A browser supplement Google Analytics Opt-out may be downloaded from: http://tools.google.com/dlpage/gaoptout.
- Google AdWords and Sklik services: We can also use the advertising system Google AdWords and Sklik, including the remarketing service. As a part of this service, Google and Seznam use first page cookies and third party cookies to distribute advertisements and related services based on previous visits of the portal. Details of use of Google AdWords are available at https://adwords.google.com/select/tsandcsfinder?country=CZ.
- Google remarketing technology: Our websites may use the Google remarketing technology, which allows users who have already visited our on-line services and shown interest to display targeted ads on the websites of our partner network Google. Similarly, it is possible to address users who resemble our website visitors. Information relating to the use of the website, which is created by a cookie, will be transferred by Google and saved on servers in the United States. In case of transmission of an IP address, its length is reduced to the last three digits. Cookies help analyse user behaviour on the website and use such information in the provision of targeted recommendations of products and ads based on user interest. If you are not interested in receiving such ads you can prohibit the use of cookies for such purposes via the Google website at: https://www.google.com/settings/ads/. Users may also prohibit the use of cookies by third parties on the deactivation website of the Network Protection Incentive (http://www.networkadvertising.org/ choices/). Please be advised that Google applies its own personal data protection principles, which are independent on our principles. We do not assume any responsibility for Google's principles and procedures. Before using our website, you should get familiar with the principles of protection of personal data applied by Google (https://www.google.com/intl/en/ policies/privacy/).
- **Hotjar:** Our website also uses the Hotjar Cookies, which serve for remembering whether you have participated in a survey. <u>If you wish to deactivate Hotjar, go to the following link: https://www.hotjar.com/opt-out.</u>

13. Automated decision-making:

We do not carry out any automated decision-making.

14. Amendments to the document Information on the Protection of Personal Data:

We reserve the right to make at any time any changes, adjustments and updates of this document Information on the Protection of Personal Data. Please check regularly whether you work with the most recent version of this document.

Effective date of this document: 25 May 2018



List of Joint Controllers in the Sekyra Group

Sekyra Group, a.s., ID No.: 63998611, registered office U Sluncové 666/12a, Karlín, 180 00 Prague 8
Sekyra Group Real Estate SE, ID No.: 24692468, registered office U Sluncové 666/12a, Karlín, 180 00 Prague 8
Belárie Real Estate, s.r.o., ID No.: 24255351, registered office U Sluncové 666/12a, Karlín, 180 00 Prague 8
Convenio, investiční fond s proměnným základním kapitálem, a.s., ID No.: 24751448, registered office U Sluncové 666/12a, Karlín, 180 00 Prague 8

DEJVICE-CENTER, a.s., ID No.: 26195542, registered office U Sluncové 666/12a, Karlín, 180 00 Prague 8 **EMA ROCHOVÁ, s.r.o.,** ID No.: 61467987, registered office U Zvonařky 1435/9, Vinohrady, 120 00 Prague 2 **epstein&partner CHODOV, a.s.,** ID No.: 26169444, registered office U Sluncové 666/12a, Karlín, 180 00 Prague 8 **HROTANO CZECH s.r.o.,** ID No.: 04748832, registered office U Sluncové 666/12a, Karlín, 180 00 Prague 8 **Konsorcium Rohan, s.r.o.,** ID No.: 27893669, registered office U Sluncové 666/12a, Karlín, 180 00 Prague 8 **Míšeňská A.M.,** s.r.o., ID No.: 26175932, registered office U Sluncové 666/12a, Karlín, 180 00 Prague 8 **Miškovická, s.r.o.,** ID No.: 24143332, registered office U Sluncové 666/12a, Karlín, 180 00 Prague 8 **Nové Tuhnice, s.r.o.,** ID No.: 24756687, registered office U Sluncové 666/12a, Karlín, 180 00 Prague 8 **Palmovka Development Partners, s.r.o.,** ID No.: 27955371, registered office Antala Staška 1859/34, Krč, 140 00 Prague 4

Pankrác Development, s.r.o., ID No.: 27417352, registered office Antala Staška 1859/34, Krč, 140 00 Prague 4 PENTADOM spol. s.r.o., ID No.: 27174191, registered office U Sluncové 666/12a, Karlín, 180 00 Prague 8 Petrská property, s.r.o., ID No.: 07990391, registered office U Sluncové 666/12a, Karlín, 180 00 Prague 8 QUATRODOM spol. s.r.o., ID No.: 27175791, registered office U Sluncové 666/12a, Karlín, 180 00 Prague 8 RealFin Servis s.r.o., ID No.: 28473451, registered office U Sluncové 666/12a, Karlín, 180 00 Prague 8 REZIDENCE NEKÁZANKA a.s., ID No.: 06270255, registered office Gogolova 228/8, Hradčany, 118 00 Prague 1 Rohan A four, s.r.o., ID No.: 07708424, registered office U Sluncové 666/12a, Karlín, 186 00 Prague 8 Rohan A one, s.r.o., ID No.: 07708025, registered office U Sluncové 666/12a, Karlín, 186 00 Prague 8 Rohan A three, s.r.o., ID No.: 07708238, registered office U Sluncové 666/12a, Karlín, 186 00 Prague 8 Rohan A two, s.r.o. ID No.: 07708238, registered office U Sluncové 666/12a, Karlín, 186 00 Prague 8 Rohan B five, s.r.o., ID No.: 07060564, registered office U Sluncové 666/12a, Karlín, 180 00 Prague 8 Rohan B four, s.r.o., ID No.: 03893332, registered office U Sluncové 666/12a, Karlín, 180 00 Prague 8 Rohan B one, s.r.o., ID No.: 24127523, registered office U Sluncové 666/12a, Karlín, 180 00 Prague 8 Rohan B three, s.r.o., ID No.: 03886140, registered office U Sluncové 666/12a, Karlín, 180 00 Prague 8 Rohan B two, s.r.o., ID No.: 24127418, registered office U Sluncové 666/12a, Karlín, 180 00 Prague 8 SG Kofir, s.r.o., ID No.: 27572668, registered office U Sluncové 666/12a, Karlín, 180 00 Prague 8 SG Mountain Resort, s.r.o., ID No.: 27607372, registered office U Sluncové 666/12a, Karlín, 180 00 Prague 8 SGRE One, a.s., ID No.: 26777614, registered office U Sluncové 666/12a, Karlín, 180 00 Prague 8 Smíchov Campus s.r.o., ID No.: 07589671, registered office U Sluncové 666/12a, Karlín, 180 00 Prague 8 Smíchov č.p. 125, s.r.o., ID No.: 24126110, registered office U Sluncové 666/12a, Karlín, 180 00 Prague 8 Smíchov development II. s.r.o., ID No.: 28164164, registered office U Sluncové 666/12a, Karlín, 180 00 Prague 8 Smíchov Infra, s.r.o., ID No.: 07565160, registered office U Sluncové 666/12a, Karlín, 180 00 Prague 8 Smíchov OLHR, s.r.o., ID No.: 07565186, registered office U Sluncové 666/12a, Karlín, 180 00 Prague 8 Smíchov OLOE, s.r.o., ID No.: 07565194, registered office U Sluncové 666/12a, Karlín, 180 00 Prague 8 Smíchov OLOW 2, s.r.o. ID No.: 07975490, registered office U Sluncové 666/12a, Karlín, 180 00 Prague 8 Smíchov OLOW, s.r.o., ID No.: 07565208, registered office U Sluncové 666/12a, Karlín, 180 00 Prague 8 Smíchov One, s.r.o., ID No.: 03885810, registered office U Sluncové 666/12a, Karlín, 180 00 Prague 8 Smíchov Station Development, a.s., ID No.: 27244164, registered office U Sluncové 666/12a, Karlín, 180 00 Prague 8 Smíchov Three, s.r.o., ID No.: 03893898, registered office U Sluncové 666/12a, Karlín, 180 00 Prague 8 Smíchov Two, s.r.o., ID No.: 03868672, registered office U Sluncové 666/12a, Karlín, 180 00 Prague 8 Tandem One, s.r.o., ID No.: 27878589, registered office U Sluncové 666/12a, Karlín, 180 00 Prague 8 Tandem Two, s.r.o., ID No.: 27449190, registered office U Sluncové 666/12a, Karlín, 180 00 Prague 8 VINCOLIA, a.s., ID No.: 24758078, registered office U Sluncové 666/12a, Karlín, 180 00 Prague 8 Vinořský dvůr, s.r.o., ID No.: 24681059, registered office U Sluncové 666/12a, Karlín, 180 00 Prague 8 Žižkov Station Development, a.s., ID No.: 28209915, registered office U Sluncové 666/12a, Karlín, 180 00 Prague 8 The SEKYRA FOUNDATION, ID No.: 07420994, registered office U Sluncové 666/12a, Karlín, 180 00 Prague 8