

The Rules of Personal Data Processing

Welcome to the webpage **www.digitalpark.sk**! In the beginning, we recommend acquainting yourself carefully with these Rules of Personal Data Processing which we observe when processing the personal data provided by you.

1. Introduction

Your privacy is important to us, and therefore, we try to ensure a high level of your personal data protection when processing them as well as to maintain the transparency of their processing in accordance with the Regulation (EU) 2016/679 of the European Parliament and the Council of 27 April 2016 on Personal Data Protection, repealing Directive 95/46/EC (General Data Protection Regulation) (hereinafter only as “**GDPR**”).

For the purposes of GDPR, the Controller who specifies a purpose and scope of the processing of personal data provided using some of the functionalities of this website is the company **Penta Real Estate, s. r. o.**, having its registered office on Digital Park II, Einsteinova 25, Bratislava 851 01, Company ID: 51 284 502, entered into the Commercial Register of District Court Bratislava I, section: Sro, file no. 124856/B (hereinafter only as “**PRE**” or “**Controller PRE**”). Should you have any questions concerning the processing of the personal data we have received from you using some of the functionalities of this website or should you wish to exercise some of the following rights that arise from GDPR for you, please, contact us in writing at the above mentioned address of the Controller PRE’s registered office or electronically via email at the address **GDPR_PRE_SR@pentarealestate.com**.

In case of the Group’s information system IS Marketing, the Joint Controllers are both PRE and the company Penta Investments, s. r. o., having its registered office on Digital Park II, Einsteinova 25, Bratislava 851 01, Company ID: 47 258 896, entered into the Commercial Register of District Court Bratislava I, section: Sro, file no. 124855/B (hereinafter only as “**Joint Controllers**”).

2. Collecting the Personal Data

These rules apply to the processing of the personal data we receive from you directly by means of (a) a contact form filled in, (b) a request to be sent newsletters, (c) provision of feedback and (d) personal data which you will provide to us by phone or via e-mail based on the contact data disclosed on this website.

We also collect cookies when this website is being used. For more information <https://www.digitalpark.sk/wp-content/uploads/2020/05/cookies-digitalpark.sk-en.pdf>

3. The Personal Data We Process about You

For the purposes specified below in point 4 hereof, we process the personal data:

- a) about individuals who are interested in buying apartments or purchasing or renting non-residential premises within PRE’s real estate projects.
- b) about individuals who are interested in being kept updated about a current offer within PRE’s real estate projects, and
- c) about individuals whom the Joint Controllers intend to approach in the interest of doing their marketing activities.

However, we process the acquired personal data in line with the principle of minimalization of personal data processing imposed by GDPR, and therefore, we only process them to a necessary extent and in the following scope: name and surname, email address and phone number.

The subject-matter of personal data processing conducted by us does not include special categories of personal data as defined by GDPR or personal data of persons of less than 16 years of age.

It is especially important that the personal data that we process concerning you are true and up to date. Please, inform us if your personal data change over the course of processing.

4. The Purposes for which We Process Your Personal Data

We process your personal data for the following purposes:

- a) communicating with you, receiving a reaction or feedback to an interest or complaint expressed and submitted by you by means of some of the functionalities of this website or by using the contact data displayed on this website;
- b) the Joint Controllers' marketing purposes that are in line with the law; and
- c) for the purposes of administering and protecting this website.

In case that we process your personal data for the purpose of direct marketing in the form of sending the newsletter, we always give you an option to unsubscribe from the newsletter should you are no longer interested in subscription in future.

The personal data we process for the Joint Controllers' purposes of marketing are processed in the Group's special information system IS Marketing based on an agreement made between the Joint Controllers.

5. Legal Grounds for the Processing of Your Personal Data

The processing of your personal data for the purposes specified above in letter a) point 4) (i.e. Communication based on the interest expressed by you) and for the purposes described in letter b) point 4) (i.e. the Joint Controllers' marketing activities) is based on our legitimate interest (i) in communicating actively with the individuals who express their interest in a piece of real estate from our real estate portfolio, and (ii) in effective marketing support and promotion of our business activities and real estate portfolio offer. Even though our legitimate interests are the legal ground for the processing of your personal data, we always respect and prefer your rights and interests to our own.

In case of personal data processing for the purpose of administering and protecting of this website as defined in letter c) point 4 hereof, the legal ground for the personal data processing is also the legitimate interest of ensuring the provision of IT services and maintenance of safety.

The processing of your personal data based on our legitimate interest arises from Article 6 Paragraph 1 Letter f) of GDPR. However, you have a right to object to the afore mentioned processing of your personal data anytime. For that purpose, feel free to contact us anytime in writing at our registered office address specified at the beginning of this Rules or at the email address: **GDPR_PRE_SR@pentarealestate.com**. We will assess each and every objection carefully and keep you updated about a result.

6. Duration of the Processing of Your Personal Data

We store your personal data for how long it is necessary to do so to achieve the purposes for which we have acquired them. The duration of the processing of your personal data is 3 years as from the day when they are acquired. We regularly check the duration of personal data processing, and in case the period expires, we stop processing the personal data and delete or destroy the personal data.

7. Sharing Your Personal Data with Third Parties

In accordance with the purposes of processing specified herein, we also conduct the processing of our personal data through third persons.

Such third persons are service providers whose services are used by the Controller PRE to make it possible to conduct the processing of your personal data for the purposes as specified herein. In particular, they are the services connected with technical and software support and the administration of marketing and sales activities of the Controller PRE and the companies through which the Controller PRE conducts the development, construction, and sale of real estates within individual real estate projects, as well as of the Joint Controllers.

The third person also is the company **Digital Park I, s.r.o.**, with its registered office at Digital Park II, Einsteinova 25, 851 01 Bratislava – Urban District Petržalka, Slovak Republic, Company ID: : 51 009 871, registered in the Commercial Register of the Bratislava District Court I, section: Sro, File no. 121699/B, through which the Controller PRE conducts the development, construction, and sale of real estates within the Digital Park 1, Digital Park 2 a Digital Park 3 projects.

The third person also is the company **Digital Park II, s.r.o.**, with its registered office at Digital Park II, Einsteinova 25, 851 01 Bratislava – Urban District Petržalka, Slovak Republic, Company ID: : 51 009 773, registered in the Commercial Register of the Bratislava District Court I, section: Sro, File no. 121628/B, through which the Controller PRE conducts the development, construction, and sale of real estates within the Digital Park 1, Digital Park 2 a Digital Park 3 projects.

The third person also is the company **Media and Digital Services a. s.**, having its registered office on Einsteinova 21, 851 01 Bratislava – Urban District Petržalka, Slovak Republic, Company ID: 48 238 902, entered into the Commercial Register of District Court Bratislava I, section: Sa, file no. 6196/B, which ensures the administration of marketing activities for the Controller PRE.

As a subcontractor, a company which provides website support and marketing communication services also participates in processing your personal data.

In connection with cookies for which a consent is not required in line with the Principles of the use of cookies (see a link above), the following companies are our Processor:

- **Google Ireland Ltd.**, having its registered office on Gordon House Barrow Street, Dublin 4, DO4E5W5, Ireland, CRO: 368047, in connection with the processing of analytical cookies through the Google Analytics platform;
- **Facebook Ireland Ltd.**, having its registered office on 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland, CRO: 462932, in connection with the processing of analytical cookies through the Facebook Pixel platform.

The Controller PRE has entered into an agreement on personal data processing with the Processors.

The Processors as well as the Sub-Processor are obliged to process your personal data exclusively for the purposes as specified herein. Your data are not disclosed to third parties for the purpose of using them independently or processing them beyond the framework of the purposes specified under these Rules.

8. International Transfer of Your Personal Data

The software system in which your personal data are processed based on a licence agreement concluded between the Controller PRE and a software system provider is stored on servers of the system provider having its registered office in the United Kingdom of Great Britain and Northern Ireland.

9. Your Rights Connected with the Processing of Your Personal Data

The GDPR confers on you a considerable scope of rights, which we respect, and we will enable you to assert them in full scope. In asserting your rights, you are in particular entitled to:

- request from us a copy of the personal data which we hold about you, and a description of a way we use these personal data;
- request the correction of the personal data which we hold about you if you assume that these personal data might be inaccurate, out of date, incorrect;
- request the erasure of the personal data which we process about you in case that we process your personal data based on your consent;
- request that your personal data which we process about you by automated means based on your consent be provided to a third person;
- request that we restrict the use of your personal data or the purpose of processing in certain limited cases;
- object to the processing of your personal data under certain circumstances because we process your personal data based on our legitimate interests.

If you are interested in receiving further information about your rights arising from the GDPR which you may claim towards us in relation to the processing of your personal data, please, do not hesitate and contact us in writing at our registered office address specified at the beginning of these Rules or via email at the address **GDPR_PRE_SR@pentarealestate.com**.

Our interest is to try to reply to any questions and resolve any complaints connected with the processing of your personal data. However, should you have a feeling that we had failed to resolve your complaint, please, take a note of the fact that you have a right to complain to the Office for Personal Data Protection of the Slovak Republic.

These Rules of Personal Data Processing may be supplemented or amended unilaterally anytime.

Penta Real Estate, s.r.o.
Penta Investments, s. r. o.
