

INFORMATION ABOUT THE PROCESSING OF PERSONAL DATA

Dear tenants, dear business partners,

the company **Argo Alpha s.r.o.**, ID No.: 044 86 277, with its registered seat at Prague 1, V celnici 1031/4, Postal Code: 110 00, the Czech Republic, registered in the Commercial Register administrated by the Municipal Court in Prague, Section C, Insert No. 248450 (hereinafter the “**Company**”) appreciates your confidence and undertakes to protect of your personal data.

Through this memorandum, we would like to inform you in accordance with the 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 (General Data Protection Regulation) (hereinafter the “**Regulation**”) about the collection, storage, use and transfer of your personal data (hereinafter the “**Processing**”). Furthermore, we would like to inform you in particular of the purposes for which these personal data are processed, who could be a recipient of these personal data and what are your rights in connection with the processing of personal data.

The subject matter of this memorandum is the processing of personal data of tenants and business partners – natural persons, as well as identification and contact details of statutory or others representatives of a tenant or business partner if it is a legal entity. The subject matter of this memorandum is also the processing of personal data of employees or other cooperating persons of a tenant or business partner, provided that the Company processes personal data of these persons.

1. Who is responsible for the processing of personal data

The processing of personal data for the purposes listed below is the responsibility of the Company which is, in relation to personal data, in the role of a controller.

The controller is not obliged to appoint a Data Protection Officer within the meaning of the Regulation.

2. What categories of personal data we process

We process in particular the following personal data:

- contact and identification data (title, name and surname, address of permanent residence, correspondence address, date of birth, e-mail address, telephone number);
- information about concluded contracts (the date of conclusion of the contract, description of the activity, etc.);
- data necessary for keeping the Company's accounts;
- data about professional life (qualifications of a business partner etc.); and
- we also temporarily (max. 48 hours) keep a visual (visual) record of your person from the CCTV system in the building in order to protect the property and the safety of people in the building. The visual recording is not a processing of the special category of personal data (sensitive data) within the meaning of Article 9 (1) of the GDPR. In principle, it is a visual identification of a person in connection with his or her particular conduct. Thus, we will be able to identify, through a CCTV system, a record on which, for example, a crime

was recorded, regardless of the nationality, race, ethnic origin, religion, health status of the person or regardless of the biometric characteristics of that person. The special category of personal data would be processed if some of the data subject's biometric characteristics (facial characteristics / main body features, walking biometric characteristics, facial recognition system, etc.) were stored and / or compared when capturing or processing an image record). In the event that such harmful conduct is not recorded, i.e. such record is not necessary for the protection of legitimate interest of our company, your person, a third party or the public interest to be used as evidence, the recording will be after a specified time (max. hours) automatically overwritten. In the event that such action is recorded on the CCTV, the CCTV will be retained for the time necessary to protect the legitimate interest of our company, your person, a third party or the public interest. There will be no automated decision making, including profiling, when processing an image.

3. The purpose of the processing of personal data

We will process your personal data for the following purposes:

- for the purpose of implementing and fulfilling of lease agreements;
- for the purpose of keeping accounts, including billing and invoicing, and fulfillment of our obligations resulting from the Act on Accounting, as amended;
- for the purpose of enabling external communication with you;
- for the purpose of compliance with obligations arising from generally binding legal regulations and for the purpose of compliance with obligations towards public authorities;
- for the purpose of the property protection;
- where necessary to prevent, investigate and detect criminal offenses and (presumptive) illegal activities.

4. Legal basis for the processing of personal data

In particular, the processing of your personal data is based on the following legal basis:

- fulfillment of the obligations arising from the concluded lease agreements;
- fulfillment of the obligations arising from generally binding legal regulations (e.g. fulfillment of tax legal obligations); and
- the legitimate interest of the Company; the legitimate interest is defined as protection of the rights resulting from a concluded contract, if it is violated by you, or if you have any claim against us in relation to the concluded contract. We process the personal data for the purposes of their use in the eventual judicial execution or enforcement of claims and rights of the Company in the event of a breach of contract by a business partner and for the purposes of legal defense in case that a claim in connection with a concluded contract is raised against us.

If required by the applicable regulations on protection of personal data, we will ask you to grant us a consent to the processing of your personal data. In particular cases, we will inform you about the means of processing of personal data, and we will also inform you about the consequences which would result from a situation when you will not grant us your consent. Should you not grant us your consent, we will process your personal data only if there is a legal basis other than consent to the processing of personal data.

5. Recipients of your personal data

Primarily, the recipient of your personal data is the Company.

If necessary, the Company will (but only exclusively) in order to fulfill the above-mentioned purposes, transmit - individually and to the extent necessary - your personal data to the following recipients:

- to the contractors (contractual partners) of the Company that are involved in its business activities, in particular to the suppliers of property management services (CBRE s.r.o., ID No.: 257 59 604, and PQ Asset Management, s.r.o., ID No.: 032 22 586) and the supplier of accounting services (ASB Accounting, s.r.o., ID No.: 272 15 849) a service/management of the camera systems (Dussman Service s.r.o. ID No.: 458 06 276, HOHE facility s.r.o., ID No.: 032 89 702) - these entities also guarantee standards of protection under the Regulation and have concluded agreements on processing of personal data with the Company;
- to the other service providers such as insurance companies and professional advisors – lawyers, auditors and tax advisors;
- to the courts and other public authorities.

6. The place of processing of personal data

Your personal data will not be processed outside the territory of the European Union and the European Economic Area. We will provide and make your personal data available only to those authorities that are authorized to process them.

7. The method of protection of personal data

The Company uses appropriate technical and organizational measures to protect your personal data against accidental or unlawful destruction, loss, alteration, further provision or use.

The Company has imposed on all employees and other relevant persons handling your personal data, as well as the persons to whom personal data is transferred, the obligation to maintain confidentiality when handling your personal data.

8. Retention period of personal data

The Company retains your personal data only for as long as it is necessary to achieve the appropriate purpose, respectively as long as the Company is required to keep your personal data by operation of law. Unless otherwise provided by the applicable generally binding legal regulations, the necessary period of the processing of such personal data is deemed to be the period of duration of your contractual relationship with our Company and the period of 3 years immediately following the termination of our last contractual relationship.

9. Rights of the data subject in relation to the processing of personal data

Under the applicable regulations on protection of personal data, you have - as a data subject - a series of rights towards each (co-responsible) controller, namely:

- right of access to your personal data to the extent referred to in Article 15 of the Regulation;

- right to rectification and right to have incomplete personal data completed in accordance with Article 16 of the Regulation;
- right to request erasure of your personal data under the conditions set out in Article 17 of the Regulation;
- right to data portability and their transmittance to another controller in accordance with Article 20 of the Regulation; and
- right to object to the processing of personal data in accordance with Article 21 of the Regulation.

If you decide to use any of the above rights, we are required to identify you, i.e. to verify whether the enforcement of the rights is requested by the person whose personal data are processed by our Company. These rights can be claimed by to our contact person (see point 10 below). You may also file a complaint against the processing of your personal data with the supervisory authority, i.e. the Office for Personal Data Protection (*Úřad pro ochranu osobních údajů*).

10. Contact person for the processing of personal data

If you have any further questions regarding the processing of personal data to which you cannot find answers in this memorandum, you can contact Mr. Michal Šimek, who is our contact person for these purposes, either by calling the phone number +420 775 621 852 or by sending an e-mail to the following e-mail address: michal.simek@pqam.cz.

11. The memorandum on the processing of personal data and its review

We regularly review this memorandum. Once we find that a change in our IT applications or our practices affect the processing of your personal data, we will notify you of this fact by posting an updated version of this memorandum on our website (<http://www.argo-offices.cz/en>) or otherwise.