

Information on personal data processing

Dear ladies and gentlemen,

in accordance with the Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and in accordance with the Data Processing Act No. 110/2019 Coll., please allow us to inform you about the manner in which we in VIG FUND, a.s. (hereinafter the "Company") process your personal data in connection with our Company's activities and performance of contractual obligations.

In this document, we will provide you in particular with information on the types of personal data we collect, on how we use them and for what purpose, to whom we are authorized to provide your personal data, where you can obtain information about your personal data that we process and about your rights in the area of personal data protection.

Please read this information carefully. Should you have any questions, we will be glad to answer them in our offices at Templová 747/5, 110 00, Prague 1, by e-mail using the following e-mail address info@vigam.cz.

1 Introduction

Our Company processes your personal data for the purpose of negotiating a contract or execution or performance of a contract with you. Without the provision of your personal data, we would not be able to negotiate the contract with you or our business partner whose employee or other contact person you are, execute it or perform our contractual obligations. Furthermore, we process your personal data in order to protect legal claims (in other words, so that our Company could defend its own legal claims in court, out-of-court or enforcement proceedings. In properties owned by us, we process your personal data through camera systems, control and registration of entry at the reception desk, electronic control of entries in the office and garage premises (entry cards for office premises and entry cards for garages), for the purpose of protecting property and the life and health of people, obtaining evidence for responsible authorities (courts, police and municipal authorities) and obtaining materials for solving insurance claims. Without providing this data, you may not be allowed to access our properties. We perform all such processing directly based on the applicable legal regulations.

Information on the processing of personal data through camera systems is provided in a separate document.

2 Information on personal data controller

The controller of your personal data is: VIG FUND, a.s., with its registered office at Templová 747/5, Staré Město, 110 00 Prague 1, Id. No.: 24220809, registered in the Commercial Register kept by the Municipal Court in Prague under File No. B 17896.

3 Principles of personal data processing

We comply with the following principles of personal data processing:

- we process your personal data fairly and in a transparent manner;
- we collect your personal data for specific, explicit and legitimate purposes;
- we process only adequate and relevant personal data and the processing is limited to what is necessary in relation to the purposes for which they are processed;

- we process only accurate personal data and take measures necessary for the deletion or rectification of inaccurate personal data;
- we store your personal data in a form enabling your identification only for the period of time necessary for the purposes for which personal data are processed;
- we process your personal data in a manner that ensures appropriate security of the personal data, including protection against unauthorized or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organizational measures.

4 Legal basis for processing and purposes of personal data processing

Personal data processing without your consent

We process your personal data mainly for the purpose of being able to enter into a contractual relationship with you or our business partner whose employee or other contact person you are and to perform the ensuing obligations. We further process your personal data in order to enable you to safely enter and move around our properties. We may process your personal data without your consent as such processing is necessary:

- For the purpose of negotiating a contract or execution or performance of a contract provided that we conclude the contract directly with you. This includes, in particular, purchase contracts, lease contracts, agreements on mortgage or pledge, contracts for work, consultancy services agreements, contracts of mandate, innominate agreements, other agreements concerning the provision of services or use of property, including securing of obligations following from the contracts. In these cases, the provision of your personal data is our contractual requirement as it is not possible to conclude the contract or perform ensuing obligations without it.
- To perform our legal duties, in particular for accounting and tax purposes or fulfilment of archiving obligations.
- For the purposes of legitimate interests of our Company. These include, in particular, enforcement of receivables, resolving disputed matters (court and other disputes), protection of life and health of persons and property (video surveillance systems, control of records of entries at the reception, entry cards/chips for office and garage premises)¹ or conclusion and performance of a contract provided that we conclude such a contract with our business partner whose employee or other contact person you are.

5 Extent of processed personal data

We process your personal data to the extent necessary for attaining the above-specified purposes. We process in particular your:

- communication regarding negotiation of lease agreements²;
- identification details (e.g. name, surname, academic title, company, date of birth, Id. No. and Tax Id. No., number of the entry card/chip for the office and the garage premises, subject of business place of business);
- contact details (e.g. contact addresses, e-mail addresses, telephone numbers, function or work position);
- data following from the performance of obligations under the contracts (e.g. contract number, amount of your obligations, bank account number and payment details, data on the movement of entry cards/chips for office and garage premises around the properties, communication regarding the fulfillment of the contract).

6 Sources of personal data

Personal data we process about you originate from the following sources:

- you provided us with the data particularly in connection with the conclusion and performance of the contract;
- we obtain the data¹, in properties owned by us, through camera systems³, entry cards for the office⁴ and the garage premises⁵;
- we acquired the data from our business partner whose employee or other contact person you are; or
- the data originate from by its purpose compatible public sources, lists and evidences, e. g. the Commercial Register and the Trade Register.

7 Manner of personal data processing

We process personal data manually in our Company's information systems. Your personal data are processed by our employees and may also be processed by third parties to the necessary extent. Prior to the transfer of personal data to third parties, we enter into a written agreement with them, which binds them by the same obligations concerning personal data processing that our Company is bound by. Employees of our company or other persons, who process personal data based on a contract with our company, and their employees are obliged to maintain the confidentiality of personal data. We collect the personal data of property visitors only to the extent necessary to fulfill the stated purpose and only in accordance with this purpose. We do not carry out any individual automated decision-making or profiling when processing your personal data.

8 Recipients of personal data

Your personal data may be disclosed to third parties such as companies providing us accountancy and tax services, property and asset management, facility management, reception or security and monitoring services, persons operating and servicing the system of electronic control of entry to the office and the garage premises of the properties owned by us. If such third parties participate in the processing of personal data, we enter into a written agreement with them, which binds them by the same obligations concerning personal data processing that

¹ The purpose of the processing is the protection of the property of our company and its tenants and the life and health of people, obtaining data for the responsible authorities (courts, police and municipal authorities), obtaining material for solving insurance claims. The systems are used for the purpose of increasing the protection of property (prevention of theft, burglary and vandalism, detection of damage to property), increasing the safety of people (prevention and detection of physical attacks on people, robberies, theft, other physical harm and other behavior in violation of legal regulations), prevention and detecting the occurrence of extraordinary natural events and other damages and solving insurance claims, as well as detecting and identifying possible perpetrators of illegal acts, monitoring the availability of escape routes and ensuring the supervision of the properties.

² In particular, to prove the content of the contract, or in connection with pre-contractual liability.

³ Camera systems with recording installed in the properties are located in exteriors and interiors. The data processing is carried out as the acquisition and storage of a camera recording capturing the movement and behavior of individuals present in the properties or in their immediate vicinity. Further details are provided in separate documents related to the camera systems.

⁴ Access (entry) cards are issued to the individuals authorized to enter the defined areas in the properties equipped with an electronic access control system (hereinafter referred to as "EKV"). The data processing is carried out as a record of the entry cards holders and data on the movement of the entry cards around the properties. The records are kept electronically. The EKV system is owned and operated by our company. To operate and service the system, our company uses contractual partners (processors of personal data) with whom it has duly concluded an agreement on the processing of personal data in the sense of Article 28, paragraph 3 GDPR.

⁵ Entry cards are issued to the vehicle drivers, who are authorized to enter the property garages. Our company registers vehicles entering and exiting from/to garage spaces in the properties. The data processing is carried out as a record of the entry cards holders and data on the movement of entry cards around the garages of the properties. The records are kept electronically. The system is owned and operated by our company. To operate and service the system, our company uses contractual partners (processors of personal data) with whom it has duly concluded an agreement on the processing of personal data in the sense of Article 28, paragraph 3 GDPR.

our Company is bound by. Your personal data may be also disclosed to other subjects in cases, when we are obliged to do so or when it is necessary for the purposes of our legitimate interests (such as courts, police, municipal authorities, insurance companies dealing with insurance events etc.) Your personal data may be stored on third-party servers, including, but not limited to, servers of webhosting or cloud services providers.

9 Period of storage of personal data

We process the personal data only for the period necessary for the purposes of their processing. We regularly evaluate whether it is still necessary to process your personal data for the given purpose. If your personal data are no longer necessary for any of the purposes of the processing, we destroy them. We process your personal data for the following individual purposes:

- we process personal data necessary for the execution and performance of the contract during the negotiations on the contract and the term of the contractual relationship; after that, personal data may usually be used for the limitation period for any of any related claims and for 1 further year in case that any your claim or claim of our business partner whose employee or other contact person you are shall be made at court at the end of a limitation period without our company being notified about it.;
- we process personal data necessary for the purposes of enforcement of receivables and resolving disputed matters during the term of the litigation;
- we process personal data necessary for accounting and tax purposes for the period stipulated by legal regulations;
- in order to comply with our archiving duties, we process the personal data for the archiving period stipulated by the legal regulations;
-

- for the protection of life and health of persons and the property through camera systems for a period of 72 hours (unless longer processing is necessary to solve an emergency);
- for the protection of life and health of persons and the property through entry cards for the duration of the lease agreement (unless longer processing is necessary to resolve an emergency);
- for the protection of life and health of persons and the property through the visitor's book at the reception for 1 year (unless longer processing is necessary to solve an emergency).

10 Your rights

a) Right of access to personal data

You have the right to request confirmation from us whether our Company processes your personal data. If our Company processes your personal data, you have the right to have access to such personal data, the right to obtain information on the purpose of processing of the personal data, personal data categories, recipients of personal data to whom the personal data were disclosed, the period of storage of the personal data or the criteria for determining this period, information on the right to request rectification or erasure of personal data, restriction of their processing, possibility to object to the processing and the right to file a complaint with a supervisory authority. We shall provide you a copy of your personal data on your request.

b) Right to rectification of personal data

If your personal data that we process are inaccurate, you are entitled to request that our Company rectify them without undue delay.

c) Right to erasure

You have the right to request that our Company delete your personal data that we process without undue delay if:

- the data are no longer necessary for the purposes for which they were collected or processed;
- you withdraw your consent to personal data processing and no other legal grounds for processing your personal data exist;
- personal data are processed for the purposes of legitimate interests of our Company or a third party and you have raised an objection against personal data processing and no overriding legitimate grounds for processing exist;
- the personal data have been processed unlawfully;
- personal data must be erased to fulfil the legal obligation stipulated by the laws of the EU or the Czech Republic.

However, you do not have the right to request erasure of personal data if the processing of personal data by our Company is necessary:

- for exercising the right of freedom of expression and information;
- to fulfil the legal obligation stipulated by the laws of the EU or the Czech Republic (e.g. the duty to deposit accounting records);
- for reasons of public interest in the area of public health;
- for archiving purposes in public interest;
- for the establishment, exercise or defense of legal claims by our Company;
- when dealing with an emergency that occurred in our properties.

d) Right to restriction of processing

You have the right to request that we restrict the processing of personal data concerning you if:

- you request rectification of your personal data; the processing shall be restricted for the period during which we verify the accuracy of your personal data;
- we process your personal data at variance with the legal regulations, but, at the same time, you refuse the erasure of the personal data and only request that the personal data processing be restricted;
- we do not need the personal data for the set purposes of processing any more, but, at the same time, you need the data for the establishment, exercise or defence of legal claims;
- personal data are processed for the purposes of legitimate interests of our Company or a third party and you have raised an objection against personal data processing; the processing shall be restricted until we establish whether we will act on your request.

e) Right to data portability

If personal data processing is based on your consent or if the data are processed on the basis of execution and performance of a contract with you, you have the right to obtain from our Company your personal data that you

provided to us in a structured, commonly used and machine-readable format, and the right to submit these data to another controller. This right may be exercised in addition to the right to erasure of personal data.

f) Right to object

If we process your personal data for the purposes of legitimate interests of our Company or a third party, you have the right to raise an objection, on grounds relating your particular situation, against personal data processing at any time. If you raise such an objection, our Company may no longer process the personal data unless compelling legitimate grounds exist that override your interests or rights and freedoms or unless we need the personal data for the establishment, exercise or defence of legal claims (including dealing with emergencies in our properties).

g) Right to withdraw consent

If the personal data processing is based on your consent, you have the right to revoke your consent to personal data processing at any time with *ex nunc* effects. Withdrawal of the consent or if you will not consent shall not have any negative consequences for you. If no legal grounds for personal data processing exist, we may not further process your personal data.

h) Right to lodge a complaint

If you believe that your personal data are processed at variance with the legal regulations, you have the right to file a complaint with the Office for Personal Data Protection, which is authorized to assess whether we process your data in accordance with the legal regulations.

Manner of exercising your rights

Your rights set out in paragraphs (a) to (g) above may be exercised *vis-à-vis* our Company in writing at Templová 747/5, 110 00, Prague 1, by e-mail sent to info@vigam.cz.

You have been hereby informed of you rights and its protection pursuant to Art. 13 – 22 Regulation (EU) 2016/679 on the protection of natural persons with regard to the processing of personal data (GDPR).