

TERMS OF PRIVACY PROTECTION OF COMPANIES BELONGING TO LUCRON GROUP

These terms of privacy protection are valid from 09.09.2019.

We care about protecting your privacy. Please, read following Terms of privacy protection carefully (hereinafter „Terms“).

These Terms fully describes how we collect, use, store and possibly publish your personal data in the process of individual activities conducted by companies belonging to the Lucron group. In case, you have any questions, queries, or privacy requests, please contact us at privacy@lucron.sk.

In case, that in these Terms concepts „Lucron“, „we“, „us“ and etc. are used, in that specific cases it represents one of the companies belonging to Lucron group, which has the position of The Controller for the purpose of performing GDPR to process your personal data:

- if in these Terms is not stated that The Controller in that specific case is different company, than in every case is The Controller for the purpose of performing GDPR company **Lucron Group, a.s.** with registered office at Záhradnícka 36, Bratislava - Ružinov 821 08, Id. No.: 50265105,
- in cases, than in these Terms it is stated, which company is The Controller for the purpose of performing GDPR, it can be one of following companies:
 - o IKD Malé Krasňany BD1, s.r.o., with registered office Legionárska 10, Bratislava - Staré Mesto 811 07, Id. No.: 47700190,
 - o IKD Malé Krasňany BD2, s.r.o., with registered office Legionárska 10, Bratislava - Staré Mesto 811 07, Id. No.: 48336696,
 - o IKD Malé Krasňany BD3, s.r.o., with registered office Legionárska 10, Bratislava - Staré Mesto 811 07, Id. No.: 48000566,
 - o IKD Malé Krasňany BD4, s.r.o., with registered office Legionárska 10, Bratislava - Staré Mesto 811 07, Id. No.: 48336181,
 - o IKD Malé Krasňany BD5, s.r.o., with registered office Legionárska 10, Bratislava - Staré Mesto 811 07, Id. No.: 48336220,
 - o Malé Krasňany Land Development, s.r.o., with registered office Legionárska 10, 811 07 Bratislava - Staré Mesto, Id. No.: 47 999 721,
 - o 1. Račianska, s.r.o., with registered office Legionárska 10, 811 07 Bratislava - Staré Mesto, Id. No.: 36 292 769,
 - o Urban Residence BD1, s.r.o., with registered office Legionárska 10, Bratislava - Staré Mesto 811 07, Id. No.: 48336262,
 - o Urban Residence BD2, s.r.o., with registered office Legionárska 10, Bratislava - Staré Mesto 811 07, Id. No.: 48333344,
 - o Urban Residence BD3, s.r.o., with registered office Legionárska 10, Bratislava - Staré Mesto 811 07, Id. No.: 48333387,
 - o Urban Residence BD4, s.r.o., with registered office Legionárska 10, Bratislava - Staré Mesto 811 07, Id. No.: 50439723,
 - o Urban Residence Management Company, s.r.o., with registered office Legionárska 10, 811 07 Bratislava - Staré Mesto, Id. No.: 50 939 068,
 - o Urban Residence Retail, s.r.o., with registered office Legionárska 10, 811 07 Bratislava - Staré Mesto, Id. No.: 50 759 248,
 - o Arboria Land Development, s.r.o., with registered office Legionárska 10, 811 07 Bratislava - Staré Mesto, Id. No.: 50265041

- o Arboria BD2, s.r.o., with registered office Legionárska 10, Bratislava – Staré Mesto 811 07, Id. No.: 48336386,
- o Arboria BD4, s.r.o., with registered office Legionárska 10, Bratislava – Staré Mesto 811 07, Id. No.: 48336572,
- o Arboria BD5, s.r.o., with registered office Legionárska 10, 811 07 Bratislava – Staré Mesto, Id. No.: 50 644 572,
- o Arboria BD6, s.r.o., with registered office Legionárska 10, Bratislava – Staré Mesto 811 07, Id. No.: 50644670,
- o Arboria Slnecná, s.r.o., with registered office Mlynské nivy 49, Bratislava-Ružinov 821 09, Id. No.: 36808954,
- o Arboria Veterná, s.r.o., with registered office Mlynské nivy 49, Bratislava-Ružinov 821 09, Id. No.: 36811149,
- o Arboria Piešťanská BD1, with registered office Legionárska 10, Bratislava – Staré Mesto 811 07, Id. No.: 50645579,
- o Arboria E1, s.r.o., with registered office Legionárska 10, Bratislava – Staré Mesto 811 07, Id. No.: 50645765,
- o Nesto Juh Land Development, s.r.o., with registered office Legionárska 10, 811 07 Bratislava – Staré Mesto, Id. No.: 48 179 957,
- o Nesto Sever Land Development, s.r.o., with registered office Legionárska 10, 811 07 Bratislava – Staré Mesto, Id. No.: 50 645 285,
- possibly, other companies that will belong to a companies of Lucron group in the future.

For the purpose of these Terms, following concepts has meaning as described:

„Personal data“ means every personal data which are related to a particular living natural person that is identifiable or could be identified by such data and which are processed by Lucron for any of the purposes specified in these Terms.

„The Controller“ means particular person, which determines the purposes and means of processing of personal data and it is one of the companies of Lucron group in accordance with these Terms.

„The Processor“ means person different from the controller, which in particular cases, processes personal data on behalf of the controller.

„GDPR“ means Regulation of 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).

„Websites“ means any websites which are operated by one of the companies of Lucron group, mainly www.lucron.sk, www.lucrongroup.sk, www.arboria.sk, www.jaskovyrad.sk, www.malekrasnany.sk, www.urbanresidence.sk or any other website that will be established in the future.

Lucron processes your personal data in accordance with GDPR and Act no. 18/2018 on the Protection of Personal Data and on the Amendments to certain Acts.

1. What type of Personal data and other information about you we collect?

1. Personal data that you provide to us:

You can provide us with your personal data in certain situations:

- you decide to fill in some of the contact forms for direct marketing (newsletter), to view one of the apartments or non-residential premises on one of our websites;
- you decide to contact us via email;

- you visit the sales point of one of our projects or our offices;
- you conclude with one of the companies belonging to Lucron group a reservation contract, a future purchase contract, a purchase contract or any other contract, amendments to these contracts, etc.
- you provide us with information about your credit, credit security and other information regarding your contractual relationship with the financing bank with which you have entered into a credit agreement or other similar agreement to refinance the purchase of the property.

You are providing us with any Personal Data on a voluntary basis and you are required to consider to what extent you provide your Personal Data. However, without providing some Personal Data, Lucron can not respond to your complaint or request or cannot sign a contract with you.

You are responsible for the accuracy, completeness and truthfulness of the Personal Data provided, and Lucron will rely on the accuracy, completeness and truthfulness of such Personal Data. Lucron is not responsible for any damages that may arise to you or any third party in connection with the disclosure of incorrect, incomplete or untrue Personal Data.

2. *Data, that we collect from use of our Websites*

Lucron can also get data that allowsto identify you indirectly. This is in particular the following:

- information and data from the devices you use to access the Website that may include general information about your device;
- log data that represents the data and information that our servers automatically store whenever you access the Website (especially the IP address, access time, hardware and software data you use, the number of clicks, the pages you see, or their order and time, which you spend on the site, etc.);
- information about your use of the Website;
- information obtained through cookies and other programs for monitoring users, including cookies and monitoring programs of our partners or social network operators;
- information obtained by monitoring users' activities by clicking on ad banner or a link and activity information on third-party sites (such as Browsers and Social Networks);
- information we receive through social plug-ins operated by third parties, for example Facebook´s "Like Button", etc.

Data aforesaid does not allow us to identify a particular natural living person. Lucron does not attribute the aforesaid data to a specific person.

3. *Personal data we obtain from camera records*

Lucron can also collect your Personal Information by recording your portrayal through camera records in some areas of the sales points of individual projects or in some areas of Lucron's offices.

4. *Personal data we obtain from third parties*

Lucron may also collect Personal Information from third parties and combine this Personal Data with Personal Data that Lucron has obtained from you. This is primarily the following Personal Information:

- data from social network operators (Google, Facebook, Instagram) regarding people who have liked a project or other related accounts of companies of Lucron group on social networks.

2. How do we process your Personal Data?

Lucron processes your Personal Data to the extent and in accordance with these Terms and for the purposes set forth below in these Terms. Depending on the purpose of the processing Personal Data, the Controller will be, in a specific case, one of the Lucron group companies.

1. *Sending messages for direct marketing (newsletter)*

Lucron process your Personal Data in the scope of your name, surname, email address with intent to send you newsletter to your email address to inform you about news, current product and information about companies belonging to Lucron group.

We believe that when you adduce your email address in one of the contact forms on our Website, you have agreed to be send a newsletter.

The legal basis for the processing of Personal Data is our legitimate interest in realization of direct marketing in order to offer you information and products that may be relevant to you.

The Controller in this case is Lucron Group, a.s..

Your Personal data will be processed for this purpose until the moment, when you unsubscribe from receiving emails sent for the purpose of direct marketing (newsletter).

2. *Answering questions, requests, queries*

Lucron processes your Personal Data in the scope of your name, surname, e-mail address, telephone number and any other information you decide to announce via questionnaire or via email for the purpose of contacting you as well as to answer your question, request or query to perform other activities related to your question, request, or query.

The legal basis for the processing of Personal Data in this case is our legitimate interest in providing Lucron's regular services and providing client support. The legal basis for answering questions, requests and inquiries in relation to the persons who have entered into a contract with one of the companies in the Lucron group is the performance of the contract to which the person is a contracting party.

The Controller in this case is one of the companies belonging to Lucron group, in the case of answering questions concerning the performance of the contract to which the person is a contracting party and, in other cases, the Controller is Lucron group, a.s..

Your Personal Data will be processed for the necessary time to answer your question, request or query, or if any other action is taken in connection with your question, request or query, but not longer than 3 years.

3. *Handling requests in relation to the exercise of the rights of the persons concerned under the GDPR*

Lucron processes your Personal Data in the scope of your name, surname, e-mail address, telephone number and, if appropriate, any other information you decide to announce via the questionnaire or via email for the purposes of reviewing, assessing, performing the activities, applications for the exercise of certain rights under Articles 16 to 22 of the GDPR.

The legal basis for the processing of Personal Data in this case is the fulfilment of our statutory duty.

The Controller in this case is one of the companies of the Lucron group to which the request is addressed.

Your Personal Data will then be processed and stored for 10 years from the date of receipt of the application.

4. *Performance of contractual obligations*

Lucron will process your Personal Data in the scope of the name, surname, first name, date of birth, birth number, nationality, e-mail address, telephone number and, if applicable, any other information you provide to us regarding the conclusion of a reservation contract, future purchase contract or purchase contracts, amendments to these contract , or any related contract or contract with any of the Lucron group companies for the purpose of conducting pre-contractual negotiations, preparing contractual and other documentation, performance of the contract and individual Lucron commitments in the standard and quality of Lucron's established records of contractual relations and bookkeeping, handling complaints and other requirements and our obligations.

The legal basis for the processing of Personal Data in this case is the need, at the request of the person concerned, to take measures before the contract is concluded, the performance of the contract to which the person concerned is a party and the fulfilment of our statutory obligations in relation to bookkeeping.

The Controller in this case is one of the companies belonging to Lucron group that is a party to the deal.

Your Personal Data will be processed and stored in this case for the duration of our statutory duty to record and archive these Personal Data.

5. *Camera records from CCTV systems*

Lucron processes your Personal Data in the scope of your portrait recorded and stored by our camera system in some of our sales locations or in our offices in order to protect our and your property in these premises as well as protect health and safety of you and of our employees. The rooms where video surveillance systems are installed are appropriately marked.

The legal basis for the processing Personal Data in this case is our legitimate interest in ensuring that you and your property are protected in these areas, as well as our legitimate interest of protecting your health and safety, as well as protecting health and safety of our employees.

The Controller is in the case of the sales of the project Arboria Park company Lucron Development, a.s., Id. No.: 35 925 655 and any other cases the Controller is company Lucron Group, a.s..

Your Personal Data will then be processed and stored for 14 days after the record has been made and the record will be retained for the purpose of investigating the incident or storing it for the needs of law enforcement or other authorized persons as long as this reason will remain.

3. How do we process data from Website traffic?

Lucron process data collected from your use of Website mentioned in part 1 of these Terms for purpose of providing, improving and optimization the traffic of Websites, to improve comfort during their use, to provide technical support of Websites, analytic a statistical

evaluation of the use of Websites, detecting and preventing the misuse of Websites (including fraud prevention, security incidents and other similar activities), risk assessment and legal obligations.

You can prevent such processing by banning the use or storage of cookies on your device by changing your browser settings. However, some features of the Web site may not work properly.

You can also remove cookies stored on your device. You can also choose to browse our Websites in „private" mode, which limits the extent of data stored by cookies. You can find more information about using cookies [here](#).

4. Who do we allow to access Your Personal Data?

Lucron allows to access your Personal Data in the following cases:

- if such duty results from the applicable law, in particular at the request of law enforcement agencies, courts, other public authorities or other authorized persons;
- if it is necessary to fulfil our duties and to ensure our legitimate interests, in particular to our lawyers, consultants, auditors, IT service providers, marketing and advertising agencies, etc.;
- within the Lucron group in accordance with the group management system, in particular, the individual Lucron project companies with which you have entered into contract, access personal data about this contractual relationship to Lucron Group, a.s. and Lucron Development, a.s.;
- to financing banks that provide financing or other services to Lucron companies, in particular Personal data processed for the performance of contractual obligations by individual project companies of the Lucron group are provided to a financing bank that finances the implementation and construction of the project.

With persons who have the status of the Processor, we conclude, in accordance with the GDPR, contracts on processing of personal data, and the Processors process the Personal Data always by the instructions and on behalf of the Controller. All our Processors process Personal Data in accordance with these Terms.

5. Your rights in relation to the protection of Personal Data?

As a person concerned, you have the following rights in relation to the processed Personal Data.

1. Right of the access to data

You have the right to request from Lucron a confirmation that your Personal Data are processing and requesting access to such Personal Data (Lucron may charge for requesting multiple accesses to Personal Data) and information about

- the purpose of processing Personal Data;
- the category of processed Personal Data;
- the identification of the recipient or the category of recipient to whom Personal Data has been or will be made accessible, in particular the recipient in a third country or an international organization, if possible
- the retention period of Personal Data; if this is not possible, information on the criteria for its determination;

- the right to request the correction of personal data related to the person concerned, the erasure or limitation of their processing, or the right to object to the processing of Personal data;
- the right to file a motion to initiate the proceeding for the protection of Personal Data;
- the source of Personal Data, if the Personal Data was not collected from you;
- the existence of automated individual decision-making, including profiling, in particular, information about the procedure used, as well as the meaning and expected consequences of such processing of Personal Data for the person concerned.

2. *Right to rectification*

You have the right to request from Lucron to promptly correct the incorrect Personal Data relating to you and with regard to the purpose of the processing of Personal Data and the right to complete your incomplete Personal Data.

3. *Right to erasure*

You have the right to request from Lucron to delete without undue delay the Personal Data that apply to you when:

- they are no longer necessary for the purpose for which they were collected or otherwise processed;
- you have revoked your consent to their processing and if there is no other legal basis for their processing;
- you assume their processing ;
- your Personal Data has been obtained illegally,
- is the reason for deletion of the obligation under GDPR, a special regulation or an international treaty binding the Slovak Republic; or
- were Personal data obtained in connection with the Lucron offer of information society services pursuant to Art. 8 s. 1 GDPR (offer of information services for a child).

4. *Right to restriction of processing*

You have the right to request from Lucron to restrict the processing of your Personal Data if:

- to object the accuracy of Personal Data during a period that allows Lucron to verify the accuracy of Personal Data;
- the processing of Personal Data is illegal and requires the deletion of Personal Data and requires, instead, the limitation of their use;
- Lucron no longer needs Personal Data for the purpose of processing Personal Data, but you need them to enforce or defend legal claims;
- you have objected to the processing of your Personal Data until Lucron verifies that the legitimate reasons on its behalf outweigh your legitimate reasons.

5. *Right to portability of Personal Data*

You have the right to require from Lucron to provide you with Personal Data relating to you in a structured, commonly used and machine readable format and the right to require Lucron to transfer these Personal Data to another operator but only if the legal basis for their processing is based on your consent or performance of the contract, while processing is carried out by automated means.

6. *Right to object*

You have the right to object, on grounds relating to your particular situation, to the processing of your Personal Data, including profiling, which is carried out on a legal basis of our legitimate interest. Based on your objection, we will evaluate with consideration to your particular situation, whether the protection of your legitimate interest, your rights and

freedoms override our legitimate interests that we monitor through the processing of your Personal Data, or the legitimate reason for demonstrating, enforcing or defending our legal claims.

You have the right to object to the processing of Personal Data for direct marketing purposes.

You have the right to whenever appeal your consent to the processing of Personal Data. Revocation of consent does not affect the lawfulness of the processing of Personal Data performed on its basis prior to its recall. Revocation of consent does not concern the processing of Personal Data performed by Lucron on any other legal basis than under your consent.

7. *Right to initiate the proceeding on protection of Personal Data*

You have the right to initiate proceeding on protection of Personal Data before the Office for Personal Data Protection of the Slovak Republic or other supervisory authorities in the place of residence

6. Safety

1. All Personal Data that we collect and process are protected by appropriate technical means and security measures to prevent unauthorized access or misuse of such Personal Data. We are constantly improving and implementing new administrative, technical and organizational actions to ensure the adequate security of Personal Data.
2. In disregard of our measures, it must be borne in mind that data transmission over the public Internet or any electronic data storage can not be 100% secure.
3. Parts of the Website may contain links to third party websites and services that are not owned or operated by Lucron. Lucron has no control over these sites and services. This website may use its own tools to collect information and data about you, including your personal information.

7. Changes to the Terms

1. We are authorized to change or modify these Terms at any time.
2. If we make any changes to these Terms, we will publish the new Terms on the Website and, if necessary, we will notify you of the change of Terms by email.
3. The changed Terms will be valid and effective from the moment we determine them as the date of their validity and effectiveness, and by using the Website (each site visit) you agree to these new Terms.

8. Contact us

1. If you have questions, queries or requests to these Terms, you want to withdraw consent or assert your rights, contact us by email at privacy@lucron.sk.