



PRIVACY STATEMENT FOR PROCESSING OF PERSONAL DATA OF DATA SUBJECTS EXTERNAL TO LUCRON

What is the objective and scope of this document?

The purpose of this privacy statement is to inform you of how Lucron group and its subsidiaries, for which Lucron Group a.s. provides comprehensive services and which are listed below in this document (**Lucron, “we”, “us” or “our”**) processes your personal data when you liaise with us. This privacy statement is addressed at **individuals other than** Lucron’s personnel and job candidates.

For the purposes of this privacy statement “individuals”, “you” or “your” refers jointly or severally to:

- Individuals visiting Lucron’s premises, sales points or website, or participating to events hosted by Lucron (visitors and guests),
- Individuals involved in the provision of services to the Lucron (suppliers),
- Clients and/or individuals interested in Lucron’s products and services (potential clients),
- Individuals involved in the whistleblowing process,
- Individuals that otherwise liaise with Lucron without an underlying contractual relationship (third parties).

Who is responsible for handling your personal data?

For the purpose of this privacy statement, and unless stated otherwise, Lucron group a.s. with registered office at Legionárska 10, 811 07 Bratislava – Staré Mesto Id. No.: 50265105, is the controller for the processing operations described in this document.

Depending on the situation, and when explicitly specified in this or another specific privacy statement, the following companies of Lucron may act as data controllers:

- 1. Račianska, s.r.o., with registered office Legionárska 10, 811 07 Bratislava – Staré Mesto, Id. No.: 36 292 769,



- Urban Residence BD4, s.r.o., with registered office Legionárska 10, Bratislava – Staré Mesto 811 07, Id. No.: 50439723,
- Arboria Land Development, s.r.o., with registered office Legionárska 10, 811 07 Bratislava - Staré Mesto, Id. No.: 50265041,
- Arboria Land Development II, s.r.o., with registered office Legionárska 10, 811 07 Bratislava - Staré Mesto, Id. No.: 51805758,
- Arboria BD5, s.r.o., with registered office Legionárska 10, 811 07 Bratislava – Staré Mesto, Id. No.: 50 644 572,
- Arboria BD6, s.r.o., with registered office Legionárska 10, Bratislava – Staré Mesto 811 07, Id. No.: 50644670,
- Arboria Piešťanská BD1 s.r.o., with registered office Legionárska 10, Bratislava – Staré Mesto 811 07, Id. No.: 50645579,
- Arboria BD9, s.r.o., with registered office Legionárska 10, 811 07 Bratislava – Staré Mesto, Id. No.: 51 805 766,
- Arboria BD10, s. r. o., with registered office Legionárska 10, 811 07 Bratislava – Staré Mesto, Id. No.: 53 507 576
- Arboria E1, s.r.o., with registered office Legionárska 10, Bratislava – Staré Mesto 811 07, Id. No.: 50645765,
- Arboria Retail, s.r.o., with registered office Legionárska 10, Bratislava – Staré Mesto 811 07, Id. No.: 52 134 725,
- Arboria D4, s.r.o., with registered office Legionárska 10, Bratislava – Staré Mesto 811 07, Id. No.: 52 134 865,
- Arboria D1, s.r.o., with registered office Legionárska 10, Bratislava – Staré Mesto 811 07, Id. No.: 51 814 617,
- Arboria BD7, s.r.o., with registered office Legionárska 10, Bratislava – Staré Mesto 811 07, Id. No.: 52 134 997,
- Nesto Juh Land Development, s.r.o., with registered office Legionárska 10, 811 07 Bratislava – Staré Mesto, Id. No.: 48 179 957,
- Nesto Sever Land Development, s.r.o., with registered office Legionárska 10, 811 07 Bratislava – Staré Mesto, Id. No.: 50 645 285,
- Nesto A, s.r.o., with registered office Legionárska 10, Bratislava – Staré Mesto 811 07, Id. No.: 53 060 075,
- Nesto B, s.r.o., with registered office Legionárska 10, Bratislava – Staré Mesto 811 07, Id. No.: 53 060 512,
- Nesto C, s.r.o., with registered office Legionárska 10, Bratislava – Staré Mesto 811 07, Id. No.: 53 059 115,
- Nesto Retail, s.r.o., with registered office Legionárska 10, 811 07 Bratislava – Staré Mesto, Id. No.: 53 517 521,
- Rakyta Land Development, a.s., with registered office Legionárska 10, 811 07 Bratislava - Staré Mesto, Id. No.: 52 595 528,
- Lucron BTR, s.r.o., with registered office Legionárska 10, 811 07 Bratislava – Staré Mesto, Id. No.: 53 061 063,
- Lucron Finance, s.r.o., with registered office Legionárska 10, 811 07 Bratislava – Staré Mesto, Id. No.: 51 716 054,
- Lucron Finance 2, s.r.o., with registered office Legionárska 10, 811 07 Bratislava – Staré Mesto, Id. No.: 53 874 480,
- Lucron Finance 3, s.r.o., with registered office Legionárska 10, 811 07 Bratislava – mestská časť Staré Mesto, Id. No.: 54622182,
- Lucron Finance 4, s.r.o., with registered office Legionárska 10, 811 07 Bratislava – mestská časť Staré Mesto, Id. No.: 55266002,
- Lucron Finance 5, s.r.o., , with registered office Legionárska 10, 811 07 Bratislava – mestská časť Staré Mesto, Id. No.: 53517491 ,
- Lucron Real Estate, s.r.o., with registered office Legionárska 10, 811 07 Bratislava – Staré Mesto, Id. No.: 53 106 636,
- Lucron Real Estate 3, s.r.o., with registered Legionárska 10, 811 07 Bratislava – mestská časť Staré Mesto, Id. No.: 53 517 067,



- L-Property Living, s.r.o., with registered office Legionárska 10, 811 07 Bratislava – Staré Mesto, Id. No.: 53 106 997,
- Lucron Net s.r.o., with registered office 10, 811 07 Bratislava – mestská časť Staré Mesto Id. No.: 53 517 067.

- Nesto E, s.r.o., with its registered office at Legionárska 10, 811 07 Bratislava – Staré Mesto district, Id No.: 53 516 940:
- 365.invest, správ. spol., a. s., (hereinafter referred to as “365.invest”) Id No.: 31 621 317, Dvořákovo nábrežie 4, Bratislava - Staré Mesto district 811 02 as the administrator acting on behalf of the special mutual fund for qualified investors 365.invest Equity FKI o.p.f. – 365.invest, správ. spol., a.s. became the majority shareholder of Nesto E, s. r. o. (hereinafter referred to as "Nesto E") with its registered office at Legionárska 10, 811 07 Bratislava – Staré Mesto district, ID No.: 53 516 940. This change in the ownership structure of Nesto E has no impact on the determination of the personal data controller or on the scope of the rights of data subjects under Regulation (EU) 2016/679 (GDPR) and this statement. The status of individual controllers and processors remains unchanged in accordance with the above provisions.
- In connection with the exercise of ownership and investment rights, Nesto E may make available to 365.invest and PB Servis, a. s., Id No.: 47 234 571, Karloveská 34, 841 04 Bratislava – Karlova Ves, which processes documentation for 365.invest, exclusively anonymized or aggregated data relating to the Nesto E project. This data is processed in such a way that it does not constitute personal data within the meaning of Article 4(1) of the GDPR, does not contain identifiers or uniquely identifiable combinations of data, and does not allow for the direct or indirect identification of individual natural persons – clients or other data subjects. In this respect, 365.invest and PB Servis, a. s. are third parties – recipients of anonymized data, contractually bound to use this data exclusively for the purposes of investment and corporate supervision of the Nesto E project, to implement appropriate technical and organizational measures to protect their confidentiality and to refrain from any action aimed at retroactively identifying the persons concerned.

We control the ways your personal data is collected and the purposes for which we process them. In case, you have any questions, queries, or privacy requests, please contact us at privacy@lucron.sk.

What personal data do we process?

Personal data highlighted in this privacy statement are processed for various purposes by different divisions of Lucron to manage your interactions with the organisation.

We always process your personal data for a specific purpose and only process the personal data which is relevant to achieve that purpose. We collect these data mostly directly from you; however, we may sometimes also obtain personal data related to you from third parties (e.g. from the social network companies when you like one of our projects). The personal data may be processed by different services of Lucron and/or the Project companies, depending on your liaison with these organisations.



More detailed description on how we process your personal data is available in the expandable headings below:

If you are a visitor of Lucron's premises/sales points or participating to events hosted by Lucron (visitors and guests)

Responsible Lucron function	Why do we process your personal data?	What personal data do we process?
Marketing/Sales	To organise events, manage your attendance and/or participation to events, and promote these events on different media	Videos, pictures including digital pictures and video recordings, attendance data (name, corporate email address), professional role, food preferences for small events
Office	To ensure safe and secure use of office premises and other properties	Name, contact details, professional role, License plate if used vehicles, CCTV recordings
Marketing	To send you messages for direct marketing (newsletter), to answer your questions, requests, queries when you contact us through the contact form of the website or through emails, to monitor your behaviour and activity on our website.	Through the contact form on our website, we may process your names and surname, email address, and telephone number and where applicable your custom message. We also process your Personal Data collected through the cookies of our website. For more information regarding this specific policy, please refer to our Cookie policy on the relevant website.

For the purposes of ensuring security in the office premises and other properties, the Controller is in the case of the sales of the certain project the relevant Lucron's project company and any other cases Lucron Group, a.s..

For the other processing activities described in this section, Lucron Group a.s. is the data controller.

If you are involved in the provision of services or products to Lucron (suppliers and other contractors)



Responsible Lucron function	Why do we process your personal data?	What personal data do we process?
Collaboration	To facilitate and speed up communication within the project team/ in the provision of services/delivery of goods	Name, surname, telephone number, e-mail address, name of company/employer
Office	To ensure safe and secure use of office premises and other properties To receive and send mails (including standard packages as well as the reception of mails coming from bailiffs)	Name, contact details, professional role, License plate if used vehicles, CCTV recordings
Legal	For the purposes of managing your contract(s) with us, and the case of disputes or litigations	Names, contact details, professional roles, behaviours and any other data derived from the claims
Accounting	To carry out accounting- related activities such as issuing invoices for the services and/or products we bought from you as our vendor	Identification data, contact details, bank account details, credit card number, compensations, conventions and agreements

If you are a client or potential future client of Lucron

Responsible Lucron function	Why do we process your personal data?	What personal data do we process?
Marketing	If you expressed interest in some of our offers, we may process your data for marketing purposes (e.g., to give you further information regarding an offer or to send you our newsletter).	Name, surname, e-mail address, other contact details
Accounting	To carry out accounting- related activities such as issuing invoices for the services and/or products you bought from us	Identification data, contact details, bank account details, credit card number, compensations, conventions and agreements
Sales	For the purposes of pre-sales, sales, rent, contract management, and after-sales services offered to you, as one of our residential property clients	Names, nationality, personal identifiers (date of birth, national ID number), contact details, employer and professional role, family composition, financial information,



		conventions and agreements, signature, information for ID documents
Commercial	For the purposes of pre-sales, sales, contract management, after-sales services offered to you, as one of our corporate clients	Names, contact details, professional role, signature, information about the ID documents, information for authority (Powers of attorney)
Legal	In the case of a dispute or a conflict between Lucron and you, for the purpose of managing or resolving such dispute or conflict	Names, contact details, professional roles, behaviours and any other data derived from the claims
Legal/Sales	To perform compliance procedures for the purposes of combating fraud and customer breaches (ex: AML KYC)	Personal Identification data, nationality, role, contact details, financial data (source of income), information for ID documents, signature
Sales	For the rent of a property owned by you as a property owner	Names, nationality, personal identifiers (date of birth, national ID number), contact details, financial information, conventions and agreements, signature, information for ID documents

For processing activities mentioned in the table above, the controller will be the party with whom you entered -or took steps to enter- into a contract.

Whistleblowing procedure

Responsible Lucron function	Why do we process your personal data?	What personal data do we process?
HR department	If you are a whistle-blower, a person involved in collecting or processing alerts from whistle-blowers, or a person subject to an alert from a whistle-blower, we may process your personal data within the framework of our whistleblowing procedure.	Name, contact details, behaviours, and any other data that could be derived from the whistleblowing signal



For the purpose of this processing activity, the controller will be Lucron Group a.s.

If you liaise with Lucron without an underlying contractual relationship (other third parties)

Responsible Lucron function	Why do we process your personal data?	What personal data do we process?
Legal	In the case of dispute or conflict between Lucron and Lucron's contractual parties involving you as a third party	Names, contact details, professional roles, behaviours and any other data derived from the claims

If you are a client, for the purpose of this processing activity, the controller of your personal data will be the company with which you entered- or took steps to enter- into a contract. In the other cases, the controller will be Lucron Group a.s.

Processing activities not covered by this privacy statement

There might be processing activities which involve processing of personal data of individuals external to Lucron that are addressed into details in separate privacy statements.

For any information on how we process your personal data related to:

- The use of cookies on our website – please, refer to our Cookie Policy which you can find on the bottom of the relevant Lucron or Project company website
- Recruitment – please, refer to Lucron’s recruitment privacy statement on Lucron’s website

On what basis we process your personal data?

- a) Necessary for the performance of a contract



In certain cases, the processing of your Personal Data is necessary for the performance of a contract to which you are a party, or to carry out pre-contractual measures at your request. Specifically, this applies to cases where we are considering concluding a contract with you for the reservation, future sale or actual sale of real estate, or the rental of real estate.

Consent

In very limited instances we process your personal data on the basis of your explicit consent. That is the case specifically when:

- You contact us through our website to get more information about our offers, or
- You request to receive our newsletter, or
- We ask for your consent to collect some information related to your food preferences in relation to your attendance to an event organized by Lucron, or
- We ask for your consent to take pictures or record videos of you during an event organized by Lucron.

Whenever we are processing your personal data on the basis of your consent, you are entitled to withdraw your consent at any moment and without any detriment by contacting Lucron at the following address (privacy@lucron.sk). In the email, you should clearly indicate sufficient details for us to identify you, and clearly outline for which purpose your consent was initially collected.

When your consent has been withdrawn, the processing activities that rely on that consent will be stopped as soon as practicable. However, the withdrawal of your consent does not affect the legality of the processing activities on which the consent given prior to its withdrawal was based. All data processing operations that were based on consent and took place before the withdrawal of your consent remain lawful.

- b) Compliance with a legal obligation of the data controller**
- c) Legitimate interest of the data controller**

How long do we keep your data (retention period)?

In all circumstances personal data will be kept for no longer than necessary to fulfil its purpose.

In the general case, we will keep personal data for the duration of your relationship with Lucron. Certain categories of personal data are kept for relatively shorter periods, for example data vested in the recordings of the CCTV system is kept for 72 hours maximum, unless there is an incident (in this case, the retention period is determined by the competent authority conducting the investigation). Some other categories may be kept for longer periods, when required by the law (e.g., we may keep some of your personal data for 10 years, in line with the retention period defined by the anti-money laundering laws).



You will find below a table providing you with more information regarding how long Lucron keeps your personal data.

You can get further information by contacting us at the following email: privacy@lucron.sk.

Processing activity	Personal data we process about you	Retention period
Online and social media promotions, promotion of new projects and products, general customer information, public relations activities, newsletters (external and internal)	Name, surname, e-mail address, other contact details, photos, videos	<p>We keep your Personal data related to some of our project, and your communications through our website contact form for 5 years.</p> <p>When you choose to unsubscribe to our newsletter, we delete immediately your personal data processed for this purpose.</p> <p>Contact details and correspondence address of visitors (and any other person contacting the company) are retained by Lucron for a maximum of 4 years, unless it is needed as evidence for the defence of claims</p>
Website content management, management of communication through the website forms, use of cookies	<p>Electronic identification data (IP address, cookies, moment of connection, information for browsing sessions, etc.)</p> <p>Through contact forms (names and surname, email address, and telephone number and a custom message - optional)</p>	The personal data stored on our website server are kept for 2 years
CCTV footage	Name, contact details, professional role License plate if used vehicles, CCTV recordings (for security purposes in the offices, sales points of Lucron and the construction sites)	72 hours maximum for construction sites and sales points, unless there is an incident. In this case, the retention period will be determined by the competent authority conducting the investigation

Lucron.

Accounting- invoicing, vendor administration, management of orders received and payment of orders, prospecting possible vendors and their evaluation, financial accounting administration	Names, contact details, professional role, Bank account details, credit card number Compensations, Conventions and agreements	Accounting documents are kept for 10 years following the end of the year to which they relate. Tax documents are kept for 10 years following the year to which they relate, but not less than the period for the right to levy the tax or the tax difference to lapse.
Pre-sales, sales, rent, contract management, after-sales services to residential property clients	Names, nationality, personal identifiers (date of birth, national ID number), contact details, employer and professional role, family composition, financial information, conventions and agreements, signature, information for ID documents	Purchase contracts and documentation related to monetary compensation are kept for 10 years. Other contracts with customers and business partners data are kept for a maximum of 4 years after the termination of the contract. Contact details and correspondence address of prospects (and any other person contacting the company) are also kept for maximum of 4 years, unless needed as evidence for the defence of claims
Dispute management, Litigations, Claims management	Names, contact details, professional roles, behaviours and any other data derived from the claims	In the event of an imminent dispute, the relevant documents are kept 3 years from the date of the claim in the case of claims by natural persons and 4 years from the date of the claim in the case of claims by entrepreneurs. In the case of an ongoing dispute, such documents, and the personal data they contain, are kept for the duration of the dispute. In the case of recovery during the enforcement proceedings and for a further 10 years from the final judgment



Performing compliance procedures to prospects and clients for the purposes of combating fraud and customer breaches (ex: AML KYC)	Personal Identification data, nationality, role, contact details, financial data (source of income), information for ID documents, signature	AML information of clients are kept by Lucron for 5 years
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To whom do we share your personal data?

Your personal data may be shared with parties both internal and external to Lucron.

Within Lucron	<p>The recipients of your personal data are normally Lucron’s employees. They may also be interim workers, freelancers, trainees, or consultants working for Lucron. Please refer to the former sections of this privacy statement to know how departments are processing your Personal Data.</p> <p>We may also transfer your personal data to the other group companies (listed in the section “Who is responsible for handling your personal data?”) for purposes connected with the management of the company’s business.</p>
Outside of Lucron	<p>In some circumstances, Lucron may share your data with third parties. In these cases, your data will be shared with:</p> <ul style="list-style-type: none"> - Statutory authorities - Shareholders/partners - IT service providers - Social media platforms - External suppliers for photos and videos - Digital agencies - Website maintenance providers - Event organization companies - CCTV system providers - Providers of finance and accounting software - Financial brokers - Notaries public - Providers of utility services for the rented apartment

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| | <ul style="list-style-type: none">- Dispute resolution authorities- Attorneys- Consultants- Registered auditors- External suppliers of goods and services- Financing entities/investors (e.g., funds) |
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For more information regarding the service providers used by Lucron please contact: privacy@lucron.sk.

Some of your Personal Data may also, with your consent, be disclosed publicly.

Lucron further ensures that when third-party service providers process data on behalf of Lucron, appropriate contractual safeguards are put in place to protect your personal data.

Please note that we may use or disclose your personal data if we are required by law to do so or if we reasonably believe that use or disclosure is necessary to protect our rights and/or to comply with judicial or regulatory proceedings, or other legal processes.

When do international transfers of personal data take place?

Your personal data is processed mainly within the European Economic Area or in jurisdictions which provide adequate level of protection and may be transferred outside of the European Economic Area on a limited basis.

If your personal data is transferred outside of the European Economic Area, you will be informed in the relevant privacy statements. We will also take steps to ensure that appropriate safeguards are in place to protect such data. Adequate safeguards may include a data transfer agreement with the data recipient based on the European Commission Standard Contractual Clauses (SCCs) or other appropriate mechanisms.

For the purposes set out in this privacy statement, your personal data may be transferred to third countries when we use service providers based outside of the European Economic Area.

For further details relating to the transfers described above and the adequate safeguards used with respect to such transfers, please contact us at privacy@lucron.sk.

What are your rights?

You have various rights as an individual which you can exercise under certain circumstances in relation to your personal data that we hold. You have the right to access, rectify, delete or limit the processing of personal data collected concerning you.

- **Your right of access** - you have the right to ask us for copies of your personal information that we process .
- **Your right to rectification** - you have the right to ask us to rectify your personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- **Your right to erasure** - you have the right to ask us to erase your personal information in certain circumstances.
- **Your right to restriction of processing** - you have the right to ask us to restrict the processing of your personal information in certain circumstances.
- **Your right to data portability** – you have the right to receive the personal data concerning you that you have provided to us in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller, where the processing is based on your consent and is carried out by automated means.
- **Your right to object to the processing of your personal data** – You have the right to object at any time to the processing of your personal data when it is based on our legitimate interest or the legitimate interest of a third party; in particular, you may object to the processing of your personal data for direct marketing purposes.
- **Your right not to be subject to automated individual decision-making including profiling** – you have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you.

Please contact us at privacy@lucron.sk if you wish to make a request. You are not required to pay any charge for exercising your rights. If you make a request, we will undertake all necessary efforts to respond within a reasonable period of time.

You also have the right to lodge a complaint with the Slovakian Supervisory Authority. The latter can be contacted at:

Office for Personal Data Protection of the Slovak Republic

Námestie 1. mája

811 06 Bratislava

Slovak Republic

Email address: statny.dozor@pdp.gov.sk

How do we secure your personal data?

Lucron takes all reasonable steps to ensure that appropriate security measures are in place to protect the confidentiality and integrity of your personal data.

How can you get in touch in order to exercise your rights?

If you have questions or concerns regarding this privacy statement, please do not hesitate to contact us at privacy@lucron.sk or send your request to the following address: Legionárska 10, Bratislava – Staré Mesto 811 07.