Last updated: 05/2026

STATEMENT ON THE PROTECTION AND PROCESSING OF PERSONAL DATA OF DATA SUBJECTS OUTSIDE LUCRON

What is the purpose and scope of this document?

The purpose of this privacy statement is to inform you about how the Lucron Group and its subsidiaries, or companies for which Lucron Group a.s. provides comprehensive services and which are listed below in this document **(Lucron, "we", "us"** or **"our")** process your personal data when you communicate with us. This privacy statement is intended for **persons other than** Lucron **employees** and job applicants.

For the purposes of this privacy statement, the terms "individuals", "you" or "your" refer collectively or individually to:

- Persons who visit Lucron's premises, points of sale or websites, or who attend events organised by Lucron (visitors and guests),
- Persons involved in the provision of services to Lucron (suppliers),
- Clients and/or individuals interested in Lucron's products and services (prospective clients),
- Individuals involved in the process of reporting unfair practices,
- Individuals who otherwise cooperate with Lucron without a formal contractual relationship (third parties).

Who is responsible for processing your personal data?

For the purposes of this privacy statement and unless otherwise stated, Lucron Group a.s., with its registered office at Legionárska 10, 811 07 Bratislava – Staré Mesto district, Company ID No.: 50 265 105, is the controller of the processing operations described in this document.

Depending on the situation, and where expressly stated in this or another specific privacy notice, the following Lucron companies may act as data controllers:

- 1. Račianska, s.r.o., with its registered office at Legionárska 10, 811 07 Bratislava - Staré Mesto, Company ID No.: 36 292 769,
- Urban Residence BD4, s.r.o., with its registered office at Legionárska 10, 811 07 Bratislava - Staré Mesto, Company ID No.: 50 439 723,
- Arboria Land Development, s.r.o., with its registered office at Legionárska 10, 811 07 Bratislava - Staré Mesto, Company ID No.: 50 265 041,

- Arboria Land Development II, s.r.o., with its registered office at Legionárska 10, 811 07 Bratislava - Staré Mesto, Company ID No.: 51 805 758,
- Arboria BD5, s.r.o., with its registered office at Legionárska 10, 811 07 Bratislava - Staré Mesto, Company ID No.: 50 644 572,
- Arboria BD6, s.r.o., with its registered office at Legionárska 10, 811 07 Bratislava - Staré Mesto, Company ID No.: 50 644 670,
- Arboria BD9, s.r.o., with its registered office at Legionárska 10, 811 07 Bratislava – Staré Mesto district, Company ID No.: 51 805 766,
- Arboria BD10, s. r. o., with its registered office at Legionárska 10, 811 07 Bratislava – Staré Mesto district, Company ID No.: 53 507 576,
- Arboria Piešťanská BD1, s.r.o., with its registered office at Legionárska 10, 811 07 Bratislava – Staré Mesto, Company ID No.: 50 645 579,
- Arboria E1, s.r.o., with its registered office at Legionárska 10, 811 07 Bratislava – Staré Mesto, Company ID No.: 50 645 765,
- Arboria Retail, s.r.o., with its registered office at Legionárska 10, 811 07 Bratislava - Staré Mesto, Company ID No.: 52 134 725,
- Arboria D4, s.r.o., with its registered office at Legionárska 10, 811 07 Bratislava - Staré Mesto, Company ID No.: 52 134 865,
- Arboria D1, s.r.o., with its registered office at Legionárska 10, 811 07 Bratislava - Staré Mesto, Company ID No.: 51 814 617,
- Arboria BD7, s.r.o., with its registered office at Legionárska 10, 811 07 Bratislava - Staré Mesto, Company ID No.: 52 134 997,
- Nesto Juh Land Development, s.r.o., with its registered office at Legionárska 10, 811 07 Bratislava - Staré Mesto, Company ID No.: 48 179 957,
- Nesto Sever Land Development, s.r.o., with its registered office at Legionárska 10, 811 07 Bratislava - Staré Mesto, Company ID No.: 50 645 285,
- Nesto A, s.r.o., with its registered office at Legionárska 10, 811 07 Bratislava - Staré Mesto, Company ID No.: 53 060 075,
- Nesto B, s.r.o., with its registered office at Legionárska 10, 811 07 Bratislava - Staré Mesto, Company ID No.: 53 060 512,
- Nesto C, s.r.o., with its registered office at Legionárska 10, 811 07 Bratislava - Staré Mesto, Company ID No.: 53 059 115,
- Nesto G, s.r.o., with its registered office at Legionárska 10, 811 07 Bratislava – Staré Mesto district, Company ID No.: 53 517 521,
- Lucron BTR, s.r.o., with its registered office at Legionárska 10, 811 07 Bratislava – Staré Mesto district, Company ID No. 53 061 063,
- Lucron Finance, s.r.o., with its registered office at Legionárska 10, 811 07 Bratislava – Staré Mesto district, Company ID No.: 51 716 054,
- Lucron Finance 2, s.r.o., with its registered office at Legionárska 10, 811 07 Bratislava – Staré Mesto district, Company ID No. 53 874 480,
- Lucron Finance 3, s.r.o., with its registered office at Legionárska 10, 811 07 Bratislava – Staré Mesto district, Company ID No.: 54622182,
- Lucron Finance 4, s.r.o., with its registered office at Legionárska 10, 811 07 Bratislava – Staré Mesto district, Company ID No.: 55266002,
- Lucron Finance 5, s.r.o., with its registered office at Legionárska 10, 811 07 Bratislava – Staré Mesto district, Company ID No.: 53517491,
- Lucron Real Estate, s.r.o., with its registered office at Legionárska 10, 811 07 Bratislava – Staré Mesto district, Company ID No.: 53 106 636,
- Lucron Real Estate 3, s.r.o., with its registered office at Legionárska 10, 811 07 Bratislava – Staré Mesto district, Company ID No.: 53 517 067,
- L-Property Living, s.r.o., with its registered office at Legionárska 10, 811 07 Bratislava – Staré Mesto district, Company ID No.: 53 106 997,
- Lucron Net s.r.o., with its registered office at Legionárska 10, 811 07 Bratislava – Staré Mesto district, Company ID No.: 53 517 067,
- Vydrica Development V4, s. r. o., with its registered office at Legionárska 10, 811 07 Bratislava – Staré Mesto, Company ID No.: 52 213 943.

- Nesto E, s.r.o., with its registered office at Legionárska 10, 811 07 Bratislava – Staré Mesto district, Company ID No.: 53 516 940:

- The company **365.invest, správ. spol., a. s.,** (hereinafter referred to as "365.invest") Company Registration Number: 31 621 317, Dvořákovo nábrežie 4, Bratislava – Staré Mesto district 811 02, acting as the manager on behalf of the special investment 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, Company ID No.: 53 516 940. This change in the ownership structure of Nesto E does not affect the designation of the data controller or the scope of data subjects' rights 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 rights and investment supervision, Nesto E, s. r. o., as the controller, may:
  - routinely make available anonymised or aggregated data that does not fall within the definition of personal data under Article 4(1) Regulation (EU) 2016/679;
  To make personal data available to a limited extent and for strictly defined purposes:
  - to PB Servis, a. s., acting as a processor in accordance with the principles of Article 28 of the Regulation and Act No. 395/2002 Coll. on archives and records,
  exclusively for the purpose of records management and only in accordance with the controller's written instructions;
  - 365.invest, solely for the purposes of investment supervision, corporate governance and the exercise of shareholder rights.

We monitor the methods used to collect your personal data and the purposes for which it is processed. If you have any questions, queries or requests regarding the protection of personal data, please contact us at privacy@lucron.sk.

What personal data do we process?

The personal data referred to in this privacy statement is processed by various departments within Lucron for various purposes, with the aim of managing your interactions with the company.

We always process your personal data for a specific purpose and only process personal data that is relevant to achieving that purpose. We usually obtain this data directly from you; however, we may sometimes obtain your personal data from third parties (e.g. from social media when you follow one of our projects). Personal data may be processed by various departments within Lucron and/or project companies, depending on your connection with these companies.

A more detailed description of how we process your personal data can be found below:

If you are a visitor to Lucron's premises/sales outlets or are attending events organised by Lucron (visitors and guests)

Lucron's responsible function	Why do we process your personal data?	What personal data do we process?
Marketing/sales	Organising events, managing your participation in events and promoting these events in various media.	Video recordings, photographs (including digital photographs and video recordings), attendance details (name, company email address), professional role, meal preferences for small events
Office	Ensuring the safe and secure use of office premises and other properties	Name, contact details, professional role, vehicle registration number if vehicles are used, CCTV footage
Marketing	To send direct marketing messages (newsletters), to respond to your questions, requests and enquiries when you contact us via the contact form on the website or by email, and to monitor your behaviour and activity on our website.	Through the contact form on our website, we may process your first name and surname, email address and telephone number, and, where applicable, your message. We also process your personal data obtained via cookies on our website. You can find more information about these specific policies in our cookie policy on the relevant website.

For the purposes of ensuring security in office premises and other properties, the data controller is the relevant Lucron project company in the case of the sale of a specific project, and Lucron Group, a.s. in all other cases.

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

If you are involved in providing services or products to Lucron (suppliers and other contractual partners)

Lucron's responsible function	Why do we process your personal data?	What personal data do we process?

Cooperation	To facilitate and expedite communication within the project team/when providing services/delivering goods	First name, surname, telephone number, email address, company/employer name
Office	Ensuring the safe and secure use of office premises and other properties Receiving and sending post (including standard parcels, as well as receiving post from bailiffs)	Name, contact details, professional role, vehicle registration number if vehicles are used, CCTV footage
Legal aspects	for the purposes of managing your contract(s) with us and in the event of disputes or legal proceedings	names, contact details, professional roles, conduct and any other data arising from claims
Accounting	Carrying out accounting-related activities, such as issuing invoices for services and/or products we have purchased from you as our supplier.	Identification details, contact details, bank account details, credit card number, compensation, agreements and contracts

If you are a client or a potential future client of Lucron

Lucron's data controller	Why do we process your personal data?	What personal data do we process?
Marketing	If you have expressed an interest in one of our offers, we may process your data for marketing purposes (e.g. to provide you with further information about the offer or to send you our newsletter).	First name, surname, email address, other contact details
Accounting	Carrying out accounting-related activities, such as issuing invoices for services and/or products you have purchased from us.	Identification details, contact details, bank account details, credit card number, compensation, agreements and contracts
Sales	For the purposes of pre-sale, sale, rental, contractual and after-sales services that we offer to you as one of our clients in the residential property sector.	Names, nationality, personal identification data (date of birth, national ID number, ID card number, contact details, employer and job title, family composition, financial information, agreements and contracts, signature, information on identity documents

Commercial	For the purposes of pre-sale, sales, contractual and after-sales services that we offer to you as one of our clients.	Names, contact details, job title, signature, details of identity documents, details of authorisation (power of attorney)
Legal matters	In the event of a dispute or conflict between Lucron and you, for the purposes of managing or resolving such a dispute or conflict	names, contact details, job title, conduct and any other information arising from the allegations
Legal services/sales	Implementation of compliance procedures for the purposes of combating fraud and violations of client rights (e.g. AML KYC).	Personal identification data, nationality, role, contact details, financial data (source of income), information from identity documents, signature
Sales	For the purpose of letting property that you own as a property owner	Names, nationality, personal identification data (date of birth, national ID number, contact details, financial information, contracts and agreements, signature, information on identity documents

In the case of the processing activities listed in the table above, the controller will be the party with whom you have entered into a contract or taken steps to enter into one.

Procedure for reporting unfair practices

Lucron's responsible function	Why do we process your personal data?	What personal data do we process?
Human Resources Department	If you are a whistleblower, a person involved in collecting or processing reports from whistleblowers, or a person to whom a whistleblower's report relates, we may process your personal data as part of our reporting procedure.	Name, contact details, behaviour and any other data that may be derived from the report.

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

If you are working with Lucron without a contractual relationship (other third parties)

Responsible function at Lucron	Why do we process your personal data?	What personal data do we process?
Legal aspects	In the event of a dispute or conflict between Lucron and Lucron's contractual partners that concerns you as a third party	names, contact details, job title, conduct and any other data arising from the claims

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

Processing activities not covered by this privacy statement

There may be processing activities involving the processing of data subjects' personal data outside Lucron, which are described in detail in separate privacy statements.

Any information regarding how we process your personal data relating to:

- Use of cookies on our websites – please see our cookie policy, which can be found at the bottom of the relevant Lucron website or specific project page.
- Recruitment – please see Lucron's privacy statement on its website.

We process your personal data for the following purposes:

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 take steps at your request prior to entering into a contract. Specifically, this applies when we are considering entering into a contract with you for a booking, a future sale or the actual sale of a property, or the letting of a property.

b) Consent

In very limited cases, we process your personal data on the basis of your explicit consent. Specifically, this applies when:

- You contact us via our website to obtain more information about our offers, or
- you request to receive our newsletter, or

- we ask for your consent to collect certain information regarding your dietary preferences in connection with your participation in an event organised by Lucron, or
- we ask for your consent to take photographs or record videos during an event organised by Lucron.

Whenever we process your personal data on the basis of your consent, you have the right to withdraw your consent at any time and without any detriment by contacting Lucron at this address (privacy@lucron.sk). In your email, you should clearly provide sufficient details to enable us to identify you, and clearly state the purpose for which your consent was originally obtained.

If your consent is withdrawn, the processing activities based on it will be stopped as soon as possible. However, the withdrawal of your consent does not affect the lawfulness of processing activities based on consent given prior to its withdrawal. All data processing operations that were based on consent and took place prior to its withdrawal remain lawful.

c) Compliance with the data controller's legal obligations

In certain cases, the processing of your personal data is necessary to comply with a legal obligation to which Lucron is subject. Specifically, this applies in cases where:

- We collect information as part of the process of reporting unfair practices,
- We collect information about you as a client or potential client in order to fulfil our obligations under anti-money laundering laws and the Civil Code relating to the finalisation of a contract,
- We use your personal data to fulfil our obligations under commercial law, tax and accounting legislation.

d) The controller's legitimate interest

Most of our personal data processing activities are necessary for our legitimate interests and the legitimate interests of third parties. In all such cases, we ensure that the processing is proportionate to the purpose specified by Lucron and does not override your interests or fundamental rights and freedoms.

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

Under no circumstances will personal data be retained for longer than is necessary to fulfil its purpose.

In general, we will retain personal data for the duration of your relationship with Lucron. Certain categories of personal data are retained for a relatively shorter period; for example, data contained in CCTV recordings are retained for a maximum of 72 hours from the time of recording, unless an incident occurs (in which case the retention period will be determined by the relevant authority conducting the investigation). Certain other categories may be

retained for longer at if required by law (e.g. we may retain some of your personal data for 10 years in accordance with the retention period defined by anti-money laundering legislation).

Below you will find a table providing further information on how long Lucron retains your personal data.

For further information, please contact us at: privacy@lucron.sk.

Processing activities	**Personal data we process about you**	**Retention period**
Online and social media promotion, promotion of new projects and products, general customer information, public relations activities, newsletters (external and internal)	First name, surname, email address, other contact details, photographs, videos	We retain your personal data relating to some of our projects and your communications via the contact form on our website for 5 years. When you decide to unsubscribe from our newsletter, we will immediately delete your personal data processed for this purpose. Lucron retains the contact details and postal addresses of visitors (and any other persons who contact the company) for a maximum of 4 years, unless they are required as evidence to defend claims.
Website content management, management of communication via website forms, use of cookies	Electronic identification data (IP address, cookies, time of connection, browsing session information, etc.) via contact forms (first name and surname, email address, telephone number and message – optional)	Personal data stored on our web server is retained for 2 years
CCTV recordings	Name, contact details, job title Vehicle registration number, if vehicles are used, CCTV recordings (for security purposes in offices, at Lucron sales outlets and on construction sites)	Up to 72 hours for construction sites and sales outlets, unless an accident occurs. In such cases, the retention period will be determined by the relevant authority conducting the investigation

Accounting – invoicing, supplier management, management of received orders and their payment, searching for potential suppliers and their evaluation, financial accounting	Names, contact details, job title, Bank account details, credit card number Compensation, agreements and contracts	Accounting documents are retained for 10 years following the year to which they relate. Tax documents are retained for 10 years following the year to which they relate, but for no shorter period than the time limit during which the right to assess tax or a tax difference expires.
Pre-sale, sale, letting, contract management, and after-sales services for clients in the residential property sector	Names, nationality, personal identification details (date of birth, national identity number, ID card number), contact details, employer and job title, family composition, financial information, agreements and contracts, signature, information regarding identity documents	Purchase contracts and documentation relating to financial compensation are retained for 10 years. Data from other contracts with customers and business partners are retained for a maximum of 4 years after the contract ends. Contact details and correspondence addresses of potential clients (and any other persons who contact the company) are also retained for a maximum of 4 years, unless required as evidence to defend claims.
Dispute Resolution, Legal Proceedings, Debt Management	names, contact details, job title, conduct and any other data arising from the allegations	In the event of a potential dispute, the relevant documents are retained for 3 years from the date the claim arose, in the case of claims by natural persons, and for 4 years from the date the claim arose, in the case of claims by businesses. In the event of an ongoing dispute, such documents and the personal data they contain are retained for the duration of the dispute. In the event of enforcement during enforcement proceedings and for a further 10 years from the date the judgment becomes final

Implementation of compliance procedures for potential clients and clients for the purposes of combating fraud and breaches of customer rules (e.g. AML KYC).	Personal identification data, nationality, position, contact details, financial data (source of income), information on identity documents, signature	Lucron retains AML information on clients for 5 years

Who do we share your personal data with?

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

Within Lucron	The recipients of your personal data are usually Lucron employees. They may also include temporary staff, independent contractors, interns or consultants working for Lucron. If you would like to know how departments process your personal data, please refer to the previous sections of this privacy statement. We may also share your personal data with other group companies (listed in the section "Who is responsible for processing your personal data?") for purposes related to the management of the company's operations.
Outside Lucron	In certain circumstances, Lucron may share your data with third parties. In such cases, your data will be shared with: - Statutory bodies - Shareholders/partners - IT service providers - Social media platforms - External photography and video suppliers - Digital agencies - Website maintenance providers - Event management companies - CCTV system providers - Financial and accounting software providers - Financial brokers - Notaries - Providers of utility services for a rented flat

	- Dispute resolution bodies - Solicitors - Advisors - Registered auditors - External processors of project documentation - External suppliers of goods and services Further information about the service providers used by Lucron is available at: privacy@lucron.sk. Some of your personal data may be disclosed with your consent.

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

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

When does the international transfer of personal data take place?

Your personal data is primarily processed within the European Economic Area or in jurisdictions that provide an adequate level of protection, and may be transferred outside the European Economic Area to a limited extent.

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

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

Further details regarding the transfers described above and the appropriate security measures used in connection with such transfers can be obtained at privacy@lucron.sk.

What are your rights?

As an individual, you have various rights which you may exercise in certain circumstances in relation to your personal data held by us. You have the right to access, rectify, erase or restrict the processing of personal data concerning you.

- **Your right of access** – you have the right to ask us for copies of your personal data that we process.
- **Your right to rectification** – you have the right to ask us to correct your personal data if you believe it is inaccurate. You also have the right to ask us to complete any information you believe to be incomplete.
- **Your right to erasure –** in certain circumstances, you have the right to ask us to erase your personal data.
- **Your right to restriction of processing –** in certain circumstances, you have the right to ask us to restrict the processing of your personal data.
- **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 you have the right to transmit this 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 where it is based on our legitimate interests or those 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.

If you wish to make a request, please contact us atprivacy@lucron.sk . You do not have to pay any fees to exercise your rights. If you make a request, we will make every effort to respond to you within a reasonable timeframe.

You also have the right to lodge a complaint with the Slovak supervisory authority. You can contact them 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 protect 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.

Who can you contact to exercise your rights?

If you have any 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.