GENERAL INFORMATION ON THE PROCESSING OF PERSONAL DATA (hereinafter referred to as the "PD").

Within the meaning of the GDPR ("General Data Protection Regulation") of the European Parliament and Council (EU) 2016/679, in force and effect from 25 May 2018 and 18/2018 of the Personal Data Protection Act (hereinafter referred to only as the "Act and Regulation") and (hereinafter referred to also as the "Terms and Conditions")

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1. WHO ARE WE?

The protection of your privacy when using our website located on the domain **www.inovareal.com** is extremely important to us. Therefore, in the following text, we thoroughly inform you about the processing of your personal data. This document constitutes an annex to the General Terms and Conditions and is an integral part thereof.

The company responsible for the protection of personal data of this website: **InovaReal SK s.r.o.**, with its registered office at Doležalova 15C, Bratislava - Ružinov District 821 04, Company Reg. No.: 54 039 428, registered in the Commercial Register of the District Court of Bratislava I, Section: Sro, File No.: 155088/B (hereinafter referred to as "InovaReal" or "Controller" or "WE") is the operator of the website www.inovareal.com (hereinafter referred to as the "Website") and the provider of related services of the "Innovative Realties" project. When using and processing personal data, the company strictly complies with the relevant personal data protection regulations.

Contact details of the Controller: Email: privacy@inovareal.com

The Controller has designated an entity responsible for personal data. Name of the responsible entity: **KROČKA & PARTNERS s.r.o.** Registered office: Plzenská 16/3, 831 03 Bratislava

Contact: dpo@krockaparters.sk

The purpose of the "Innovative Realties" project is to provide digital services that allow consumers and/or merchants to conclude online purchase contracts or service contracts with merchants either through the InovaReal website or the website of a merchant that uses services provided by InovaReal. InovaReal enables consumers and merchants to conclude online contracts for the purpose of mediating the sale, rental, and purchase of real estate properties between users of the Service (hereinafter referred to as the "Service"). InovaReal also provides advertising services. Our customers can be consumers as natural persons or legal entities that decide to use the Service.

The company is the holder of the domain name and is also the owner of the rights associated with and related to this website. All published content on our website, such as texts, logos, trademarks, photographs, images, audio, or audiovisual recordings, is protected by copyright and is our property or we use it under a licence to which we have rights reserved. We allow the downloading (taking-over) of materials only for personal, non-commercial purposes and in accordance with these Terms and Conditions of Use.

The access to our website is free of charge. You bear all costs that you incur in connection with accessing our website. The content of our website may not be available continuously, especially due to a technical error by our decision, if we decide to make the content of the website or any part thereof unavailable.

We shall not be held liable for any damage (direct or indirect), loss, costs and expenses of any kind that you may incur in connection with your access and/or use of our website and/or the publication of out-of-date, false or incorrect data that constitute the content of our website, and which were created by us or caused by technical equipment, human error or software application associated with our website. We do not guarantee the compatibility of our website with your computer system or software. We also do not guarantee that this website is not infected with malicious code, or that the server that makes it available is free of malicious code or other malicious components.

It is expressly prohibited to link our website to another website or to select any part of it without our permission; to use our website for illegal purposes or for the distribution of malicious code; to change and/or to modify its content.

2. DATA SECURITY

2.1 Security of Personal Data.

The company observes strict security measures for the protection of personal data in order to prevent unauthorized or accidental access to such personal data, their change, destruction or loss, unauthorized transmission, as well as their other unauthorized processing or misuse. The company requires the compliance with equally strict measures to

ensure the security of personal data processing also from all the processors whose services it uses, specifically on the basis of concluded contracts on intermediation of personal data processing in accordance with Art. 28 of the Regulation.

The adopted measures are subject to regular control and are continuously adapted according to the latest state-of-the-art knowledge. Should there be a breach of the protection of your personal data, we will inform you without undue delay within 72 hours if such a breach of the protection of your personal data could lead to a high risk for your rights.

- 2.2 If you have been given access data to access and use our online tools on our website, you, as a user, are responsible for safe storage of your name and password and for maintaining confidentiality of such name and password.
- **2.3.** Your PD are securely transmitted thanks to encryption. The SSL (Secure Socket Layer) coding system is most often used for secure communication with web servers. The PD in our systems, such as the website, are secured by adequate technical and organizational measures against loss, destruction, alteration, and further dissemination of data by unauthorized persons.

3. BASIC TERMS

- Data Subject. Any natural person whose personal data are processed.
- Consent of the Data Subject. Any serious and freely given, specific, informed, and unequivocal expression of the will of the Data Subject in the form of a statement or unequivocal affirmative action by which the Data Subject expresses consent to the processing of their personal data.
- Personal data. Data relating to an identified natural person or an identifiable natural person who can be identified directly or indirectly, in particular on the basis of a
 generally applicable identifier such as name, surname, identification number, localization data, or online identifier, or on the basis of one or more characteristics or
 features that make up its physical identity, physiological identity, genetic identity, psychological identity, mental identity, economic identity, cultural identity or social
 identity.
- Processing of personal data. A processing operation or a set of processing operations with personal data or with sets of personal data, in particular obtaining, recording, organizing, structuring, storing, changing, searching, browsing, using, providing by transmission, dissemination or in any other way, rearranging or combining, limiting, erasing, regardless of the fact whether it is performed by automated means or non-automated means.
- **Breach of personal data protection.** A breach of security that results in the accidental or unlawful destruction, loss, alteration, or unauthorized provision of, or unauthorized access to, transmitted, stored, or otherwise processed personal data.
- Controller. Anyone who, alone or jointly with others, defines the purpose and means of personal data processing and processes personal data on their own behalf.
- **Processor**. Anyone who processes personal data on behalf of the Controller.
- **Recipient.** Anyone to whom personal data are provided, regardless of the fact whether it is a third party. A public authority that processes personal data on the basis of a special regulation or an international treaty by which the Slovak Republic is bound, in accordance with the personal data protection rules applicable to the given purpose of personal data processing, is not considered a recipient.
- Third party. Anyone who is not a Data Subject, Controller, processor, or other natural person who processes personal data under the authority of the Controller or processor.

4. WHAT PERSONAL DATA DO WE NEED AND HOW DO WE PROCESS THEM? COLLECTION AND PROCESSING OF PERSONAL DATA

4.1 Personal data provided by you

We process personal data in accordance with legal provisions on the protection of personal data in force at present.

4.2 Data Subjects are:

website visitors, web application users, prospective clients, clients, client employees, suppliers, subscribers, social media fans, etc.

4.3 Purpose of PD processing, legal basis, category of personal data and time limit for erasure

Or der No.	Category of personal data	Purpose of processing	Legal basis of processing	Time limit for PD deletion
1.	Common personal data, e.g. [stated on FA]	Accounting agenda The purpose of personal data processing is bookkeeping and fulfilment of legal obligations. We also include the processing of orders, incoming invoices, and invoicing for customers/of suppliers, etc. in the agenda in question.	Pursuant to Art. 6 (1) c) the fulfilment of legal obligations resulting from special regulations, e.g., Accounting Act.	ten (10) years from the end of the financial year
2.	Common personal data, e.g. [necessary for the conclusion of a contract, performance, and implementation of a contract]	Contracts The purpose of PD processing is the conclusion, performance and implementation of obligations arising from contracts with suppliers/customers.	Pursuant to Art. 6 (1) b) of the Regulation - contractual/pre- contractual relationship	until the settlement of rights and obligations from the contract, but at least ten (10) years from the end of the contractual relationship

3.	Common personal data, e.g. [name, surname, academic degree, company, position, contact details]	Business communication The purpose of PD processing is to maintain a database of suppliers/customers, their representatives or, as the case may be, employees of suppliers and customers for the purpose of fulfilling their work, official and functional duties to ensure smooth supplier-customer relations. What legitimate interest? Ensuring smooth supplier-customer relations and fulfilment of the contract.	Pursuant to Art. 6 (1) f) of the Regulation - legitimate interest	five (5) years from the termination of the contractual relationship or until you raise objections
4.	Common personal data, e.g. [data provided in profile]	Social networks The purpose of personal data processing is to create company profiles on social networks, for the purpose of better communication with clients (former, potential ones). You can find more information in section 4 of these Terms and Conditions. What legitimate interest? The legitimate interest of the Controller is better communication with clients/potential clients. Information about news on the web application.	Pursuant to Art. 6 (1) f) of the Regulation - legitimate interest	until the Data Subjects cancels the website tracking, deletes comments
5.	Common personal data, e.g. [data provided in profile, contact data]	Social networks - competitions The purpose of personal data processing is to organize a consumer competition. The Controller will process the personal data of the registered contestants as well as of the winner.	Pursuant to Art. 6 (1) b) of the Regulation - contractual relationship	one (1) year after the end of the competition

6.	Common personal data, e.g. [first name, last name, e-mail, phone number]	Marketing - if you are our client The purpose of personal data processing is direct marketing, sending electronic newsletters and e-mail/text messages about the Controller's news. What legitimate interest? Informing our clients about news (e.g., news concerning applications).	Pursuant to Art. 6 (1) f) of the Regulation - legitimate interest	four (4) years from the first registration, or until you raise objections
7.	Common personal data, e.g. [contact details]	Contact form The purpose of PD processing is to provide general information to the website visitor.	Pursuant to Art. 6 (1) b) of the Regulation - contractual/pre- contractual relationship	one (1) month from sending
8.	Common personal data, e.g. [data specified in the application]	Exercising the rights of Data Subjects The purpose of PD processing is to exercise the rights of Data Subjects (complaints in the field of the GDPR).	Pursuant to Art. 6 (1) c) of the Regulation - statutory obligation	five (5) years from the processing of the application

9.	Common personal data	Registry Management of incoming and outgoing mail (including electronic mail).	Pursuant to Art. 6 (1) c) of the Regulation – statutory obligation in conjunction with Art. 6 (1) f) of the Regulation - legitimate interest	five (5) years
10.	Common personal data, e.g. [photos, name, surname, academic degree, position (position in the company), name of the company]	Photos The purpose of PD processing is the presentation of the Controller and the promotion of its activities by making and publishing photos and audio-visual recordings from various actions, activities and events on the website, social networks, and advertising materials.	Pursuant to Art. 6 (1) a) of the Regulation - the consent of the Data Subject	for the period of duration of the employment relationship (if the Data Subject is an employee) or five (5) years from the day of the action/ event at which the photo/record was taken
11.	name, surname, birth number or date of birth, if the birth number was not assigned, address of permanent residence or other residence, nationality, identification of the type and number of the identity document; in the case of a natural person-entrepreneur, also ascertaining the address of the place of business, identification number, if assigned, designation of the official register or other official record in which this entrepreneur is registered, and the number of the entry in this register or record	AML The Controller processes the PD about the client for the purpose of identification in accordance with § 7 No. 297/2008 Coll. ON PROTECTION AGAINST THE LEGALIZATION OF INCOME FROM CRIMINAL ACTIVITIES AND ON PROTECTION AGAINST THE FINANCING OF TERRORISM AND ON THE AMENDMENT AND SUPPLEMENTATION OF SOME LAWS IN THE WORDING OF LATER REGULATIONS, i.e. the processing of personal data is necessary according to a special regulation or an international treaty by which the Slovak Republic is bound, for this purpose the consent of the Data Subject is not required.	Article 6 (1) c) - legal ground	five (5) years - according to the AML Directive (the Financial Intelligence Unit can specify a longer period as well)

12.	Common personal data, e.g. [at the time of registration - first name, last name, e-mail]	Setting up and using an account The purpose of personal data processing is to create a user account and enable the use of individual functions of the InovaReal application (inserting an ad, responding to an ad, responding to an ad, making identification and contact data available to other users for the purpose of concluding a lease, purchase agreement or terminating the lease, posting comments).	Pursuant to Art. 6 (1) b) of the Regulation - contractual/pre- contractual relationship	until the settlement of rights and obligations from the contract, but at least thirty (30) days from the deletion of the account
13.	Common personal data, e.g. [A photo]	Setting up and using an account The purpose of personal data processing is to publish a profile photo in the user's profile.	Pursuant to Art. 6 (1) a) of the Regulation - consent of the Data Subject	until the cancellation of the user account; the Data Subject can revoke consent at any time in their profile settings
14.	Common personal data, e.g. [data given in the complaint - name, surname, contact details, address]	Setting up and using an account The purpose of personal data processing is to process a complaint.	Pursuant to Art. 6 (1) c) of the Regulation - legal ground	one (1) year from the processing of the complaint

15.	Common personal data, e.g. [name, surname, evaluation]	Setting up and using an account The purpose of personal data processing is to give an evaluation to us as the Controller, but also mutually to other members of the community whose services you have used. What is the legitimate interest? The legitimate interest of the Controller is to improve the quality of services.	Pursuant to Art. 6 (1) f) of the Regulation - legitimate interest	from three (3) months since they used the service after thirty-six months (36) months from the publication of the evaluation
16.	Common personal data, e.g. [name, surname, message]	Provision, improvement, and development of services in the InovaReal web application The processing of personal data of users (customers) is for the purpose of providing and improving services in the InovaReal application, in particular: - interaction with community members as well as with us. What is the legitimate interest? The legitimate interest of the Controller is to improve the quality of services.	Article 6 (1) f) - legitimate interest	three (3) months

17.	Common personal data, e.g. [when concluding a rental agreement, personal data such as name, surname, address, contact information, date of birth are required. When concluding a purchase contract, personal data are required in accordance with the Cadastre Act].	Provision, improvement, and development of services in the InovaReal web application The purpose of processing personal data is to provide services to the user, which consist of concluding contracts at a distance with other users (intermediation of sales, purchases, rentals and/or provision of additional services). Different personal data are required for each contractual relationship. When concluding a rental agreement, personal data such as name, surname, address, contact information, date of birth are required. When concluding a purchase contract, personal data are required in accordance with the Cadastre Act.	Article 6 (1) b) – contractual relationship	If the contract is not concluded, we keep the data for 30 (thirty) days, if the contract is concluded, we keep the data for as long as you have an account/registration with us, after the cancellation of the account, we keep the data for another 30 (thirty) days and then we delete them
18.	Common personal data, e.g. [contact details - e-mail, text messages]	Provision, improvement, and development of services in the InovaReal application The processing of personal data of users (customers) is for the purpose of providing and improving services in the InovaReal application, in particular: - sending push notifications (e.g., about updates, security warnings, about the account, events, payments, changes).	Article 6 (1) a) of the Regulation - the consent of the Data Subject	until the cancellation of the user account; the Data Subject can revoke consent at any time in their profile settings

19.	Common personal data, e.g. [title, first name, last name, address and, in the case of a foreigner (type of stay), bank account number, payment information, telephone number, e-mail, signature, company registration number, tax registration number]	Legal/ statutory claims (Dispute agenda) The purpose of personal data processing is the resolution of disputes between the Controller and users and the recovery of receivables and other claims of the Controller through extrajudicial (e.g., mediation), judicial, and execution proceedings or bankruptcy proceedings, including legal representation. What is the legitimate interest? Making or defending the Controller's legal claims, preventing damage, and ensuring the fulfilment of claims and other legal claims of the Controller.	Legitimate interest of the Controller, Article 6 (1) f) of the Regulation - legitimate interest	five (5) years from the final termination of the proceedings or from the settlement of the legal claim
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5. SOCIAL NETWORKS

We use hypertext links (so-called links) to third-party websites. By clicking on the links provided, you will be redirected to these websites (e.g., social network websites or our partners' websites). We are unable to influence the style and content of the linked third-party websites, and at the same time, we dissociate ourselves from any content on all such websites and from adopting such content as our own. These Terms and Conditions of Use do not apply to third party websites. If you are interested to learn more about the Terms and Conditions of Use of third-party websites, please go to the relevant third-party website.

You can find more detailed information on the processing of personal data by the Controller at:

- Facebook: https://www.facebook.com/privacy/explanation

The purpose of personal data processing is to create a company profile on social networks, in order to promote the web application and our services.

The legal basis for the processing of personal data is Article 6, (1) f) of the Regulation - legitimate interest.

Personal information that you publish on our websites and social media accounts, such as comments, likes, videos, pictures, etc., will be posted through the social media platform. We do not subsequently process personal data for any other purpose. The Controller reserves the right to delete comments and other content (videos, images, etc.) if it is a violation of applicable legislation (hate comments, racist or otherwise violating basic human rights and freedoms), and the right to share your posts if you communicate through social media networks.

Posts are kept on our "timeline" on the website indefinitely or until you delete them or we, as the Controller, delete them.

6. LOGGING INTO AN ACCOUNT

- 1) Users can log into their user account using the username and password they created during registration.
- 2) The company allows you to log into your user account also through third-party services (e.g., Google or Facebook). The complete list of data that the Company requests from Facebook and Google will be displayed in the permission request window. When logging in, you determine what data you make available to us.

7. RECIPIENTS

Your personal data may be provided to the recipients. It concerns for example postal companies; professional advisors (e.g. lawyers, executors, public notaries, courts, translators); providers of standard software equipment (e.g. Microsoft, Google); providers of technical support, development and management of IT systems and applications, data processing and storage; hosting service providers; operators of social networks; external collaborators of the CONTROLLER (e.g. accounting firm) and in relation to published data, the recipients of personal data are also persons visiting the website, users of social networks.

Personal data are provided within the framework of the fulfilment of obligations arising from applicable legal regulations (e.g., law enforcement agencies, public authorities, etc.) or EU regulations that are directly enforceable and applicable also in the Slovak Republic or by processors within the framework of contractual relations in accordance with the GDPR and the Personal Data Protection Act.

We choose our partners, inter alia, with regard to their professional care guarantees, while these entities are bound by confidentiality and the obligation to take appropriate technical and organizational measures so that the processing of personal data meets the requirements of the GDPR and the Act.

8. UNDER 16 YEARS OF AGE

Please note that all services on our website can only be used by persons who have reached the age of sixteen (16). The use of services and the resulting data processing by persons with a lower age limit without the consent of parents/legal representatives is prohibited. If you become aware of such processing of personal data, we ask you to notify us immediately and we will rectify it.

9. PROCESSING TIME

The Controller only processes personal data for the necessary time and adheres to the principles of PD processing. If we have been granted consent, then for the period for which such consent was granted or revoked. If we process personal data on the basis of the law, e.g., accounting documents, we process them for 10 years. The exact storage period is specified for each purpose of processing in clause 4.3.

10. TRANSFER TO A THIRD COUNTRY

We restrict the transfer of Personal Data to a third country or international organisation, including the identification of the country or international organisation. However, some of the recipients may have servers located outside the EU (Google, Facebook). These servers may be located in the United States of America (USA). The transfer of personal data is based on the European Commission's adequacy decision and the organisations are registered with the Data Privacy Framework (DPF). To check whether organisations are registered with the DPF, you can visit this link https://www.dataprivacyframework.gov/s/.

Article 45 of the GDPR provides for the transfer of data on the basis of a European Commission adequacy decision. The European Commission's adequacy decision for the EU-US DPF came into force on 10 July 2023.

These transfers are only made on the basis of standard contractual clauses approved by the Commission and adequate safeguards have been provided under Article 46 of the GDPR:

Terms of privacy protection

Google https://policies.google.com/privacy?hl=en-US
FACEBOOK https://www.facebook.com/privacy/explanation
INSTAGRAM https://help.instagram.com/519522125107875
YOUTUBE https://policies.google.com/privacy?hl=en
LinkedIn https://www.linkedin.com/legal/privacy-policy
https://cz.linkedin.com/legal/privacy-policy?

Twitter https://twitter.com/en/privacy

Adequate guarantees provided in accordance with Article 46 of the GDPR.

Google https://privacy.google.com/businesses/Controllerterms/mccs/
https://www.facebook.com/help/566994660333381?ref=dp

https://www.facebook.com/legal/EU_data_transfer_addendum

Microsoft https://www.microsoft.com/licensing/docs/view/Professional-Services-Data-Protection-Addendum-DPA

Twitter https://gdpr.twitter.com/en/Controller-to-Controller-transfers.html

11. AUTOMATED PROFILING

The company does not use automated individual decision-making, including profiling in accordance with Art. 22 of the Regulation.

12. RIGHTS OF THE DATA SUBJECT

You have the right to exercise your rights in accordance with the GDPR, namely (i) the right to rectification, (ii) the right to erasure, (iii) the right to data portability, (iv) the right to object, (v) the right to withdraw consent, (vi) the right to access information, (vii) the right to restriction. You can exercise these rights directly in the company by sending a notification to the e-mail address privacy@inovareal.com or in writing to the address InovaReal SK s.r.o., with its registered office at Doležalova 15C, Bratislava - Ružinov District 821 04.

• Right of access

You can request from us confirmation/information as well as a copy of processed personal data, whether and to what extent your personal data is being processed. We, as a company, are obliged to provide information based on your request within thirty (30) days from the delivery of such request. We can extend this period by another sixty (60) days. We would inform you about any postponement.

• Right to rectification

You have the right to request from us to correct your incorrect PD concerning you or to supplement your incomplete PD without undue delay.

• Right to erasure

As a Data Subject, you have the right to request the Controller to delete personal data concerning you without undue delay. The Controller is obliged to delete personal data without undue delay for any of the following reasons:

- personal data are no longer necessary for the purpose for which the Controller obtained or processed such data,
- if you withdraw your consent to the processing of personal data for at least one (1) specific purpose or the consent is invalid if its provision is excluded by a special regulation,
- if you object to the processing of personal data and there are no prevailing legitimate grounds for the processing of personal data or you object to the processing of personal data related to direct marketing, including profiling,
- if we process personal data unlawfully,
- if the ground for the erasure is the fulfilment of an obligation under this Act, a special regulation, or an international treaty by which the Slovak Republic is bound, or
- if personal data were obtained in connection with the offer of information society services according to (§ 15 (1) of the draft act) and you are under 16 years of
 age.

• Right to data portability

You may request us to make the personal data you have provided to us available in a structured, commonly used, and machine-readable format to another Controller, if it is technically possible and provided that the personal data are processed based on the consent of the Data Subject, on the basis of the contract and the PD processing is carried out by automated means.

• The right to object

If we process your personal data on the basis of a legitimate interest, you can lodge an objection to the processing of your personal data at any time for reasons related to your specific situation. We may not further process personal data, unless we demonstrate our necessary legitimate reasons for processing that outweigh your interests, rights, and freedoms, or if there are reasons for proving, exercising, or defending legal claims.

Withdrawal of consent

In cases you have given us your consent, we inform you that you can revoke such consent at any time. You can revoke it in the same way as you have granted it. Revocation does not affect the lawfulness of processing based on consent before its revocation.

• You have the right to request the restriction of the processing of your data when

- you object to the correctness of these data, specifically for the period that allows us to verify the correctness of the data,
- the processing of your data is unauthorized, but you will refuse the deletion and instead you request the restriction of the data use,
- we no longer need the data for the planned purpose, but you still need this data to make, exercise or defend legal claims, or
- you have raised an objection to data processing.

• The right to file a petition to commence proceedings by the Data Subject

If you believe that your personal data is being processed unlawfully, you have the right to lodge a complaint with the Office for Personal Data Protection in the Slovak Republic, Hraničná 12, 820 07 Bratislava for more information visit https://dataprotection.gov.sk/uoou/). You may also lodge a complaint with a data protection authority other than the Slovak Republic if the relevant data protection authority is the EU Member State in which you are habitually resident or in which the alleged breach occurred. You also have the right to go to court.

13. FINAL PROVISIONS