

Identity of the Data Controller:

REICO investiční společnost České spořitelny, a.s., with the registered office at Antala Staška 2027/79, Krč, 140 00 Prague 4, ID No. 27567117, entry in the Commercial Register (hereinafter the “**REICO**”) and

the real estate companies, within the meaning of Section 100, the second part of Paragraph 2 of the Act No. 240/2013 Coll., on Management Companies and Investment Funds (hereinafter the “**real estate companies**”), in which **ČS NEMOVITOSTNÍ FOND otevřený podílový fond, REICO investiční společnost České spořitelny, a.s.** (hereinafter the “**Fund**”) have the stake (hereinafter collectively the “**Data Controller**”),

pursuant to the Regulation (EU) 2016/679 of the 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), (hereinafter the “**GDPR**”), hereby submit the following

Information Provided upon Personal Data Collection

Basic information on processing

Purpose of processing

Information on personal data processing is applicable to the natural persons, including representatives of legal persons, whose personal data are obtained in connection with the acquisition, ownership, lease or sale of real estate (including its parts or units) which is held by the real estate companies in which the Fund has an ownership interest (hereinafter the “**real estate**”).

Processing of personal data by the Data Controller is carried out in order to enable performance of the contract which is related to the transfer or lease of the real estate (or its part), and to comply with the legal obligation during management of the Fund. This applies specifically to:

- Lease of business units (selection procedure of tenant/subtenant, tenants/subtenants in the real estates owned by the Fund, handover to the property manager, lease termination, receivables enforcement),
- Real estate acquisitions/sales (personal data of the former employees of the SPV acquired along with the acquisition of the real estate),
- Personal agenda (recruitment, employment, trainings, attendance administration), and
- REICO bodies (REICO Board of Directors, company car usage, REICO Supervisory Board, Experts’ Committee, agreements with legal counsels, agreements with property and facility managers, agreements with accounting companies, agreements with other advisors, agreements with suppliers).

Legal basis

Basic legislation, defining rights and obligations regarding processing of personal data, is:

- Act No. 240/2013 Coll., on Management Companies and Investment Funds (further AMCIF),
- Regulation (EU) 2016/679 of the 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, further GDPR),
- Act No. 89/2021 Coll., New Civil Code (further NCC).

In connection with outsourcing, REICO has obligations under:

- Decree No. 244/2013 Coll., precisely defining certain rules laid down in the Act on Management Companies and Investment Funds.

Supervision of compliance with obligations regarding processing of personal data is done by:

Office for Personal Data Protection (further OPDP) – personal data of natural persons;

Czech National Bank (further CNB) – data covered by banking secrecy.

Processing of personal data within the meaning of Article 6 (Lawfulness of Processing) of the GDPR is carried out on the basis of Paragraph 1, Point b of this Article, i.e. the processing is necessary for the performance of a contract to which the Data Subject is party or in order to take steps at the request of the Data Subject prior to entering into a contract and/or on the basis of Paragraph 1, Point c, i.e. the processing is necessary for compliance with a legal obligation to which the Data Controller is the subject.

Scope and categories of personal data concerned:

Data to be processed encompass identification details (including potential payment details); in case of real estate tenants who are natural persons, the data related to the rental are also processed.

The Data Controller processes personal data that were acquired from the Data Subject and in case of real estate acquisition, the Data Controller processes personal data acquired from the seller (hence not from the Data Subject).

The Data Controller does not process sensitive personal data.

Recipients and processors of personal data:

Data Processors are the companies which administer the real estate (property managers), law offices which provide for legal services relating to the real estate, and Česká spořitelna, a.s. as the parent company of REICO.

Recipients encompass the above-stated Data Processors as well as the state authorities pursuant to the legislation; in case of certain property managers the recipients may include also the parent companies of the property managers or the companies to which the property manager outsourced some of its activities. In such case the company providing outsourced activities has to grant the adequate guarantees of personal data protection.

Retention period

Personal data are processed for the time which is necessary in terms of the purpose of processing; once the relevance of the processing purpose for individual personal data expires the personal data shall be stored for the duration of the prescribed (statutory) periods of archiving.

Information on Data Subject rights

Right of access to the personal data by the Data Subject – the Data Subject shall have the right to obtain from the Data Controller the information (confirmation) as to whether or not the personal data concerning him or her are being processed, and, where that is the case, access to the personal data and the following information:

- (i) the purposes of the processing (lease of business units, real estate acquisition/sale, personal agenda, REICO bodies),
- (ii) the categories of personal data concerned:
 - a) Lease of business units**
 - natural persons, respectively representatives of juridical person – data identifying persons and data that can be used to identify persons, data regarding the subject legal/contractual relationship (ID No./Tax ID No., name, surname, address, date of birth)
 - b) Real estate acquisition/sale**
 - representatives of juridical person – data identifying persons and data that can be used to identify persons, data regarding the subject legal/contractual relationship (ID No./Tax ID No., name, surname, address, registered office, date of birth, permanent residence address)
 - natural persons (personal data of the former employees of the SPV acquired along with the acquisition of the real estate) – data identifying persons and data that can be used to identify persons, data regarding the subject legal/contractual relationship (name, surname, address, Personal ID No., ID Card No., date and place of birth, salary, health insurance)
 - c) Personal agenda**
 - natural persons (personal agenda, recruitment, employment)

- data identifying persons and data that can be used to identify persons, data regarding the subject legal/contractual relationship (name, surname, date and place of birth, ID Card No., permanent residence)

- natural persons (training, attendance administration) – data identifying persons and data that can be used to identify persons, data regarding the subject legal/contractual relationship (name, surname, personal number)

d) REICO bodies

- natural persons (REICO Board of Directors) – data identifying persons and data that can be used to identify persons, data regarding the subject legal/contractual relationship (name, surname, permanent residence, date and place of birth, ID No.)

- natural persons (company car usage) – data identifying persons and data that can be used to identify persons, data regarding the subject legal/contractual relationship (name, surname, car registration number)

- natural persons (REICO Supervisory Board) – data identifying persons and data that can be used to identify persons, data regarding the subject legal/contractual relationship (name, surname, date and place of birth, ID Card No., permanent residence)

- natural persons (Experts Committee) – data identifying persons and data that can be used to identify persons, data regarding the subject legal/contractual relationship (name, surname, date and place of birth, ID Card No., permanent residence)

- representatives of juridical person, natural persons (agreements with legal counsels) – data identifying persons and data that can be used to identify persons, data regarding the subject legal/contractual relationship (name, surname, registration number of the Bar Association, registered office)

- representatives of juridical person, natural persons (agreements with property and facility managers, agreements with accounting companies, agreements with other advisors, agreements with suppliers) – data identifying persons and data that can be used to identify persons, data regarding the subject legal/contractual relationship (name, surname, registered office)

- (iii) the recipients or categories of recipients to whom the personal data have been or will be disclosed (Česká spořitelna, a.s., property manager, law firms, CNB, business register),
- (iv) the planned period for which the personal data will be stored (for the period necessary for termination of contractual relationship or employment),
- (v) the existence of the right to request from the Data Controller the rectification or erasure of personal data or the right to object,
- (vi) the right to lodge a complaint with a supervisory authority (Office for Personal Data Protection (further OPDP) – personal data of natural persons),
- (vii) where the personal data are not collected from the Data Subject, any available information as to their source,
- (viii) the existence of automated decision-making, including profiling (there is neither automated decision-making nor profiling).

The above-stated information is specified in this document; upon the Data Subject request the Data Controller will hand over to the Data Subject any other more detailed information or confirmation (for example the specific controlled personal data).

In case the Data Controller does not process any data of the natural person, it will convey information that the personal data of the enquirer are not subject to the personal data processing by the Data Controller.

Right to rectification – the Data Subject has the right to rectification of inaccurate personal data concerning him or her. However, this does not imply that the Data Controller is obliged to actively seek inaccurate data (nevertheless, it does not mean that that during the so-called reconciliation the Data Controller does not actively search for such data); neither it implies the Data Controller obligation to request from the Data Subject, for example, annual update of the Data Subject's data. If the Data Subject believes that the Data Controller processes his or her inaccurate personal data, he or she shall notify the Data Controller about such fact. If the Data Subject informs the Data Controller about the request for rectification of his or her personal data, the Data Controller is obliged to deal with the Data Subject's request.

Right to be forgotten – the right to erasure (to be forgotten) specified in the GDPR represents in other words the Data Controller obligation to destroy personal data if at least one of the below-stated conditions is met:

- The personal data are no longer necessary in relation to the purposes, for which they were collected or otherwise processed,
- The Data Subject withdraws consent and there is no other legal ground for the processing,
- The Data Subject objects to the processing and there are no overriding legitimate grounds for the processing,
- The personal data have been unlawfully processed,
- The personal data have to be erased for compliance with a legal obligation,
- The personal data have been collected in relation to the offer of information society services referred to in the Article of the GDPR relating to the conditions applicable to the consent of a child in connection with the information society services (this condition is not relevant in case of REICO).

Right to restriction of processing – the Data Subject has the right to the restriction of processing applied by the Data Controller where any of the following cases apply:

- The accuracy of the personal data is contested by the Data Subject, for a period enabling the Data Controller to verify the accuracy of the personal data;
- The processing is unlawful and the Data Subject opposes the erasure of the personal data and requests the restriction of their use instead;
- The Data Controller no longer needs the personal data for the purposes of the processing, but they are required by the Data Subject for the establishment, exercise or defence of legal claims;
- The Data Subject has objected to processing pending the verification whether the legitimate grounds of the Data Controller override those of the Data Subject.

Where the processing has been restricted under the previous paragraph, such personal data shall, with the exception of storage, only be processed with the consent of the Data Subject or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the European Union or of a Member State. The Data Subject who has obtained restriction of processing pursuant to the previous paragraph shall be informed by the Data Controller in advance that the restriction of processing will be lifted.

Notification obligation regarding rectification or erasure of personal data or restriction of processing –

The Data Controller shall communicate any rectification or erasure of personal data or restriction of processing carried out in accordance with the relevant articles of the GDPR to individual recipients to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort. The Data Controller shall inform the Data Subject about those recipients if the Data Subject requests it.

Right to data portability – the essence of this right is the possibility for the Data Subject to receive, under certain conditions, the personal data concerning him or her, which he or she has provided to the Data Controller, in a structured, commonly used and machine-readable format and the right to transmit those data to another Data Controller without hindrance from the original Data Controller. At the same time the Data Subject shall have the right, if he or she requires so, to get the personal data in a structured, commonly used and machine-readable format transmitted from one Data Controller to another one, where technically feasible.

The common conditions for exercising the right to portability are as follows: (i) the processing involved has to be based on the legal grounds, consent or a contract and (ii) the processing is carried out by automated means.

The exercise of the right to portability shall not adversely affect the rights and freedoms of others.

In case of REICO and the real estate companies, not all the above-stated conditions are satisfied and thus the applicability of this right is irrelevant.

Right to object – the Data Subject shall have the right, on grounds relating to his or her particular situation, to object at any time to the processing of personal data concerning him or her that are processed on the legal grounds:

The processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Data Controller; the processing is necessary for the purposes of the legitimate interests pursued by the Data Controller or by a third party. The Data Controller shall no longer process the personal data unless the Data Controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the Data Subject or for the establishment, exercise or defence of legal claims.

The objection may be raised also to processing of personal data for the purpose of direct marketing or profiling. If the Data Subject objects to processing for direct marketing purposes, the personal data shall no longer be processed for such purposes.

Automated individual decision-making, including profiling

The Data Subject shall have the right not to be subject to a decision based solely on automated processing and profiling. This right ensures for the Data Subject that he or she will not be subject to a decision that is based solely on automated processing, including profiling, which produces legal effects concerning him or her or similarly significantly affects him or her. Automated processing is admissible if it is necessary for entering into, or performance of, a contract between the Data Subject and a Data Controller, if it is authorised by the European Union or Member State law or if it is based on the explicit consent of the Data Subject.

In case of REICO and the real estate companies, no automated individual decision-making or any profiling is carried out.

To exercise their rights, the Data Subject may contact any place of business or joint administrator in person, in writing, via telephone and/or e-mail. Notwithstanding the terms of the agreement above, the Data Subject may exercise their rights according to this regulation at every administrator and with regard to any of them.

On your request regarding exercising your rights we will answer without undue delay within 30 days of receipt of the request. However, this term may be extended by another two months if necessary. We will always inform you about such extension, including the reasons that led to it. We will communicate in the way you prefer (e-mail, letter).

Contact data:

REICO investiční společnost České spořitelny, a.s.

Antala Staška 2027/79, 140 00 Praha 4

tel: +4202956786511 on working days from 9:00 to 16:00

e-mail: nemofond@reicofunds.cz

Right to lodge a complaint with a supervisory authority (Office for Personal Data Protection), if you think that rules on the personal data protection have been violated during the processing of your personal data.

Office for Personal Data Protection:

Pplk. Sochora 27

170 00 Prague 7

Phone: +420 234 665 111

Communication of a personal data breach to the Data Subject

When the personal data breach is likely to result in a high risk to the rights and freedoms of natural persons, the Data Controller shall communicate the personal data breach to the Data Subject without undue delay.

Data Protection Officer

Česká spořitelna, a.s.

ID No.: 452 44 782

Tax ID No.: CZ699001261

Registered office: Prague 4, Olbrachtova 1929/62, PSČ 140 00

Contact person:

Januška Jiří

E-mail: poverenec@csas.cz

tel.: +420 703 481 616 (on working days from 9:00 till 15:00)

Free information line of Česká spořitelna: 800 207 207 (on another days and hours)

Registered office: Prague 4, Olbrachtova 1929/62, PSČ 140 00

Joint Data Controllers

REICO and the real estate companies act as the so-called Joint Data Controllers under the GDPR, in particular due to the relationship between the Fund and the real estate companies stipulated by the Act No. 240/2013 Coll., on Management Companies and Investment Funds and due to the non-existence of employees in the real estate companies. This document is consequently submitted both on behalf of REICO as well as on behalf of the real estate companies.

Contact person for personal data related to management of the real estate companies

Mateusz Lisiewicz

E-mail: mateusz.lisiewicz@reicofunds.cz

tel.: + 420 956 786 523

Registered office: Praha 4, Antala Staška 2027/79, PSČ 140 00

Joint Data Controllers – real estate companies, in which ČS NEMOVITOSTNÍ FOND otevřený podílový fond, REICO investiční společnost České spořitelny, a.s., managed and administrated by REICO, has shares:

REICO Investment ALFA, a.s., with the registered office at Antala Staška 2027/79, Prague 4, 140 00, ID No. 271 08 619, registered in the Commercial Register kept by the Municipal Court in Prague, Section B, File 21681,

REICO Investment BETA, s.r.o., with the registered office at Laurinská 18, Bratislava, 811 01, ID No. 36 856 711, registered in the Commercial Register of the Slovak Republic, Section Sro, File 50354/B,

REICO Investment GAMA, a.s., with the registered office at Antala Staška 2027/79, Prague 4, 140 00, ID No. 261 92 896, registered in the Commercial Register kept by the Municipal Court in Prague, Section B, File 6678,

CITI TOWER, a.s., with the registered office at Antala Staška 2027/79, Prague 4, 140 00, ID No. 271 03 251, registered in the Commercial Register kept by the Municipal Court in Prague, Section B, File 17549,

JRA, s.r.o., with the registered office at Antala Staška 2027/79, Prague 4, 140 00, ID No. 607 20 824, registered in the Commercial Register kept by the Municipal Court in Prague, Section C, File 224860,

Qubix Building Prague s.r.o., with the registered office at Antala Staška 2027/79, Prague 4, 140 00, ID No. 457 95 223, registered in the Commercial Register kept by the Municipal Court in Prague, Section C, File 11588,

Topas REAL spol. s r.o., with the registered office at Antala Staška 2027/79, Prague 4, 140 00, ID No. 602 02 653, registered in the Commercial Register kept by the Municipal Court in Prague, Section C, File 25356,

Trianon Building Prague s.r.o., with the registered office at Antala Staška 2027/79, Prague 4, 140 00, ID No. 265 04 006, registered in the Commercial Register kept by the Municipal Court in Prague, Section C, File 86315,

Park One Bratislava, s.r.o., with the registered office at Laurinská 18, Bratislava, 811 01, ID No. 36 796 298, registered in the Commercial Register of the Slovak Republic, Section Sro, File 46635/B,

FORUM BC I s.r.o., with the registered office at Laurinská 18, Bratislava, 811 01, ID No. 36 796 743, registered in the Commercial Register of the Slovak Republic, Section Sro, File 46658/B,

Proximo One Spółka z ograniczoną odpowiedzialnością, with the registered office at ul. Przykopowa 33, 01-208 Warszawa, Poland, NIP 7010646167, REGON 366179917,

Sloneczna Radom Spółka z ograniczoną odpowiedzialnością, with the registered office at ul. Grzybowska 5, 00-132 Warszawa, Poland, NIP 5252347243, REGON 140145804,

Industrial Park Dubnica I, s. r. o., with the registered office at Laurinská 18, Bratislava, 811 01, ID No. 50 038 907, registered in the Commercial Register of the Slovak Republic, Section Sro, File 107110/B,

METRONOM BC s.r.o., with the registered office at Antala Staška 2027/79, Prague 4, 140 00, ID No. 289 39 794, registered in the Commercial Register kept by the Municipal Court in Prague, Section C, File 154487,

Proximo Two Spółka z ograniczoną odpowiedzialnością, with the registered office at ul. Przykopowa 33, 01-208 Warszawa, Poland, NIP 5272832875, REGON 369082851,

New Karolina Shopping Center Development, s.r.o., with the registered office at Antala Staška 2027/79, Prague 4, 140 00, ID No. 281 83 011, registered in the Commercial Register kept by the Municipal Court in Prague, Section C, File 131232.

In Prague on 9 April 2019

REICO investiční společnost České spořitelny, a.s.



Filip Kubricht
Chairman of the Board of Directors



Tomáš Jandík
Member of the Board of Directors