

PRINCIPLES FOR PROCESSING AND PROTECTING PERSONAL DATA

LEXXUS NORTON a.s.

In these principles for processing and protecting personal data we inform you of the ways in which we process (use) and protect your personal data that we have.

When we use the word “you”, we mean our customers and parties interested in our services, in particular if you concluded a contract with us (agency, reservation, etc. contract), if we are brokering the purchase of a property for you or if you have contacted us with an interest in our services (e.g. the purchase of a property) or event.

BASIC TERMS

First, we would like to explain some basic terms that we will use:

- **“LEXXUS NORTON”** means LEXXUS NORTON a.s., registered number: 26208024, registered office: náměstí Republiky 2090/3a, Nové Město, 110 00 Prague 1, entered in the Commercial Register maintained by the Municipal Court in Prague, section B, entry 6809. When we talk about “us” in these principles for processing and protecting personal data, we mean LEXXUS NORTON.
- The **“LEXXUS Group”** means all companies that are part of the same group, i.e. in addition to LEXXUS NORTON a.s. they are LEXXUS PM s.r.o., registered number: 04547951, registered office: Prague 1, Lannova 1540/6, post code: 110 00, entered in the Commercial Register maintained by the Municipal Court in Prague, section C, entry 249538, LEXXUS NORTH s.r.o., IČ: 19380496, registered office náměstí Republiky 2090/3a, Nové Město, 110 00 Prague 1, entered in the Commercial Register maintained by the Municipal Court in Prague, section C, entry 385682, LEXXUS SOUTH s.r.o., IČ: 19380542, registered office náměstí Republiky 2090/3a, Nové Město, 110 00 Prague 1, entered in the Commercial Register maintained by the Municipal Court in Prague, section C, entry 385684, and Realitní svět a.s., IČ: 27134784, registered office Na Poříčí 2090/2, Nové Město, 110 00 Prague 1, entered in the Commercial Register maintained by the Municipal Court in Prague, section B, entry 9225.
- **“Personal data”** will be understood to mean all information that identifies you or based on which you can be identified, as well as information that provides details about you (about your person, activities, assets, etc.).
- **“Processing”** of personal data will be understood to mean any operation or set of operations with your personal data or sets of your personal data that are performed with or without the help of automatic procedures, such as collecting, recording, arranging, structuring, storing, adapting or changing, searching, examining, using, disclosing through transfer, disseminating or any other disclosing, sorting or combination, restriction, deletion or destruction. Processing means the wholly or partially automatic processing of your personal data and non-automatic processing only if the personal data are contained in records or are to be classified in them.
- You are our **“customer”** if you have or have had an agency or other contractual relationship with us on the provision of our services or if you are a contractual partner in a transaction that we broker or where we are brokers.

BASIC PRINCIPLES

Personal data as a value. We regard your personal data as an important value and handle them in this spirit. When processing personal data, we proceed in accordance with Regulation (EU) 2016/679, the general regulation on personal data processing, and other valid legal regulations.

What are the basic rules? When processing personal data we pay attention, in all circumstances, to the following basic rules:

- **Lawfulness, correctness and transparency:** We process your personal data correctly and in the statutory and a transparent manner.
- **Special-purpose restriction:** We collect your personal data solely for certain, expressly stated and legitimate purposes and we do not further process the personal data in a manner that is incompatible with these purposes.
- **Minimisation:** We process personal data only to a reasonable, relevant and restricted extent, in relation to the purpose for which we process the personal data.
- **Accuracy:** We ensure that the personal data we process is accurate and, if necessary, up to date. We take all reasonable measures to ensure that personal data that is inaccurate is—with regard to the purposes for which we process it—promptly deleted or rectified.
- **Restriction on storage:** We store your personal data in a form enabling your identification for a period no longer than necessary for the purposes for which we process the personal data.
- **Integrity and confidentiality:** We ensure the protection of the personal data that we process. We process your personal data in a manner that ensures its proper security, including protection with the help of technical and organisational measures from unauthorised or unlawful processing and from random loss, destruction or damage. We use advanced physical and electronic security measures.
- **Localisation:** We store all your personal data in the Czech Republic and do not transmit it to countries outside the European Union.

How to get orientated? We process your personal data basically only for two purposes, for the administration of contracts and contractual relationships on the one hand and for marketing and sales purposes on the other hand. Both these purposes and the rules that we apply are described in detail below. Certain data that can, in certain circumstances, be identified with a specific physical person are the product of the use of cookies and web beacons; below, we therefore specify the rules valid for this technology.

PERSONAL DATA FOR ADMINISTRATION OF CONTRACTS AND CONTRACTUAL RELATIONSHIPS

What personal data is involved? We process personal data that are contained in the contracts you concluded with us and personal data that results from the course of performance of such contracts. This concerns, in particular (but not solely), contact and identification data, data about the subject of the contract that can, to a certain extent, also be information about your asset relations, and data about the course of a contractual relationship (invoicing, etc.), including business communications with you. Please bear in mind that a contract does not have to be concluded in writing, but it can be a relationship established by an oral contract.

Why do we need this personal data? It is natural that we have to process contractual personal data, so that we can meet our obligations under contracts and so that we can exercise the rights under such contracts and perform the legal duties related to them. For example, in accordance with legislation on measures against money laundering and financing terrorism we are obligated, in the set cases, to identify our customers and perform certain control measures; we are obligated to store the relevant documents for a period of 10 years.

And what about other contracts? We also process personal data from contracts that you do not conclude with LEXXUS NORTON, but that LEXXUS NORTON brokers for you. It is personal data that is necessary for the purpose of settling an agency contractual relationship that you have agreed with us or that we have agreed with your contractual partner. For example, for us to be entitled to a commission it is important when and under what conditions a brokered sale of a property occurred, how high the purchase price was and when it was paid.

Where do we obtain your personal data from? We obtain personal data for the administration of contracts and contractual data from you, but in accordance with the circumstances we can also obtain them from other sources (e.g. from your contractual partner with which you conclude a contract on purchase of property or from the land registry). We always act transparently in this regard.

Vouchers. We can obtain certain of your personal data from our contractual partners and subsequently record them, if you use one of our vouchers for goods/services offered by one of our contractual partners. In order to settle claims under contractual relationships with our partners, we need to obtain an overview of who, when and under what conditions vouchers were used.

What if a contract has not yet been concluded at all and will not be? We can process your personal data also before the conclusion of a contract, so that the contract is concluded in the proper manner. If you do not conclude a contract because an agreement is not reached or for another reason, we will process your personal data to the necessary extent in order to deal with pre-contractual questions and the responsibilities resulting from this, including performance of the related legal duties.

How long do we process personal data for? We process (store) personal data for a period for which it could, in legal terms, be important for the realisation of a contractual relationship, i.e. until the expiry of the applicable time-bar, for preclusive, complaint, storage and other similar periods stipulated by legal regulations or agreements of the contracting parties, until the expiry of the last of these periods; in a specific case the period depends on an assessment of the relevant contractual relationship; usually, however, no more than 10 years from the realisation (end) of a contractual relationship. In the case of contractual relationships that are being prepared, but have not been realised, data are processed until the expiry of the relevant time-bar periods related to pre-contractual liability.

MARKETING AND SALES PERSONAL DATA

Why do we process personal data for marketing and sales purposes? We process personal data for marketing and sales purposes for two reasons:

- On the one hand, so that we can inform our customers and other persons who can be expected to be interested in what we offer and in news through electronic newsletters, the Norton magazine and other sales communications and so that we can inform our customers and other persons that can be assumed to be interested, in individually assessed cases, by telephone, e-mail or in another similar manner, based on their interest in what we offer; and
- On the other hand, so that we can personalise our dealings with you in the case of the initiation and performance of a contractual or business relationship or dealings with you (business history, etc.).

We only process personal data for the purpose of contacting you with an offer or other sales communications if there is a reasonable expectation that you are interested in what we offer; this can be expected, in particular, if you were or are our customers. We only process personal data for the purpose of personalising dealings if you have had business contacts with us (in the sense of realisation of a certain order or dealings or an interest expressed in such order).

When can e-mail sales communications be sent? We respect the rule that using your e-mail address for the sending of sales communications is possible only if you communicated it to us as a customer or if you consent to the use of your e-mail address for this purpose. You can rescind your consent at any time; see the “Your Rights” section for the form in which this can be performed. In any case, in each e-mail business communication we give you the easy and clear option of refusing the further sending of sales communications in the form of electronic unsubscription.

What personal data do we process for this reason? This concerns the following types of personal data (not all types of personal data listed have to be processed in a specific case):

- Identification and contact personal data (name and surname, physical address, e-mail address, telephone numbers, etc.);
- Your personal characteristics in relation to our (possible) co-operation (gender, language, etc.);
- Your profile personal data in relation to our co-operation (the history and course of business relations, including your input for the purposes of the provision of agency services, the subject of purchase, the subject of a request, attendance at LEXXUS NORTON events, etc.);
- Data enabling the personalisation of communications with you (history of communications, referrals, etc.).

Using some or all of the personal data processed we create profiles of customers or potential customers that we use for the purposes described. Personal data that provide information about your racial or ethnic origin, political opinions, religious or philosophical beliefs or membership of unions, genetic personal data, biometric personal data and data about your medical condition, sex life or sexual orientation will never be processed for marketing and sales purposes.

Where do we obtain your personal data from? The sources of marketing and sales personal data for us are as follows:

- Our contractual relations with you;
- Communications you address to us (through online forms, real estate portals or social networks, by telephone, etc.);
- Through referrals from our customers (usually this concerns cases where you are interested in purchasing a property and directly contact one of our customers, who refers you to one of our brokers);
- During selected opportunities from publicly available sources (e.g. the land registry).

Legal grounds for processing personal data and right to object. The legal grounds for processing your personal data are our legitimate interest in the use of the data for marketing and sales purposes in the interests of maintaining and developing business contacts and sales activities in general. You have the opportunity to make objections to the processing of your personal data for marketing and sales

purposes. If you make objections to the use of personal data for the purpose of the sending of business communications or other forms of direct marketing, without additional action we will halt processing for such purposes. If you make objections to the use of your personal data for the purpose of personalisation of dealings with you, we will assess, based on the reasons for the objections (with regard to your specific situation) whether, on our part, there are no serious legitimate reasons for the continuance of processing that predominate over your interests or rights and freedoms and we will inform you of whether we will comply with the objections or cannot comply with them, and for what reasons. See the “Your Rights” section for the form in which objections can be made.

How long do we process personal data for? For the purpose of contacting you with an offer or other sales communications, we process (store) personal data as long as you can be reasonably assumed to be interested in it, unless you have made earlier objections to such processing. For the purpose of personalisation of dealings, we process personal data for 10 years from the day of the last business contact with you.

COOKIES AND WEB BEACONS

What are cookies and how do we use them? At our websites (lexxusnorton.cz, lexxus.cz and the other ones we operate) we use cookies, i.e. the storage of certain text files containing data about access to the website using an internet browser on your computer, where, when you visit the website again, the stored data is again sent to our web server. Cookies serve to technically ensure the correct functioning of a website, for the personalisation of the settings of a website and the improvement of the user experience, including the storage of user settings. We can also use cookies to adapt advertising and monitor traffic to our websites.

What are web beacons and how do we use them? We can also use web beacons, both at our websites and in e-mails we send. Web beacons are small graphic elements (data files, pixel marks) that are downloaded from our web server for the purpose of monitoring the frequency of e-mails or visits to our websites and the behaviour of users at them, and for subsequent optimisation of electronic services for users (including personalisation of advertising).

On what basis do we use cookies and web beacons and what can you do? The circumstances that we describe above (personalisation of settings and monitoring of website traffic, adaptation of advertising, monitoring of interest in our communications) are our legitimate interests in connection with the improvement of the services that we provide. In our opinion these activities are also beneficial to you. If you do not want, however, us to use cookies and web beacons for you, you can prevent it. The first time you access the website through a certain web browser, you will be asked to consent to the use of cookies; the technology will only be used if you grant your consent. You can cancel your consent to the use of cookies; the most practical way to do this is by deleting the cookies in your internet browser. You also have the opportunity to deactivate cookies on your computer or the sending of requests to download web beacons, by changing the relevant settings on your internet browser. Please take note that we are always entitled to use technical cookies that ensure, in particular, the correct functioning of a website and security for it in the necessary manner.

Google Signals. We use Google Signals, which allows for better personalization of advertising messages provided by Google Ads if you are logged in to your Google user account. If you consent to the use of advertising cookies on our website, Google Signals will also be activated automatically.

No identification. We do not use personal data obtained through cookies and web beacons (including Google Signals service) to identify you.

HANDOVER OF PERSONAL DATA TO THIRD PARTIES (RECIPIENTS)

Who do we hand personal data over to? Your personal data is confidential for us. With the exceptions described in the following points, we do not hand your personal data over to any third parties, directly or indirectly (through disclosure). We do not trade in personal data in any way.

LEXXUS Group. We can hand personal data over to entities that are part of the LEXXUS Group, for their processing for the purpose for which we have the personal data. The recipient will process the personal data that it receives solely in accordance with the rules that apply to LEXXUS NORTON, and we are responsible for the proper processing of personal data by the recipient.

Partners. We can hand personal data over to entities that perform personal data processing for us or that provide us with services a necessary part of which is the disclosure of personal data. This primarily concerns entities that provide us with information technology services (e.g. server hosting or webhosting), database services, accounting services, tax advice and legal services. Co-operation with such entities is always of a narrowly operational character. Recipients do not process personal data independently, but solely in accordance with our instructions. We are responsible for recipients not abusing the personal data disclosed to them and for personal data integrity and confidentiality undertakings, as well as other undertakings that should be agreed in accordance with valid legal regulations, being concluded with them.

Financial advisors. If you are our customer, we can hand over your contact data and data concerning an assessment of your financial needs to one or more of the following financial advisors: HYPOASISTENT s.r.o., if it can be reasonably assumed that you have a need to use financial advisory services in connection with a transaction we are brokering. A financial advisor is entitled to use the personal data handed over solely for the purpose of contacting you with a specific offer of financial services or a solution for your financial situation (contacting you directly or indirectly through us). Personal data of this type are handed over in connection with our legitimate interests in the successful provision of agency services. You have the right to object to the handover of personal data to financial advisors and, if you do so, we will ensure that a financial advisor does not process your personal data. We are responsible for financial advisors not abusing the personal data disclosed to them and for personal data integrity and confidentiality undertakings, as well as other undertakings that should be agreed in accordance with valid legal regulations, being concluded with them.

Approved handover. We are entitled to hand over personal data to third parties only if you grant your consent to it, under the conditions of the consent granted. You can rescind your consent at any time; see the “Your Rights” section for the form in which this can be performed.

Handover for performance of legal duties and handover necessary due to nature of matter. Your personal data can be handed over to third parties only if it is necessary for the performance of a legal duty (in particular as far as concerns public power bodies) or if it is necessary due to the nature of the matter, in particular performance of a contractual relationship to which you are a party.

YOUR RIGHTS

Right to information. You have the right to obtain from us a confirmation of whether we process your personal data or not. If so, you have the right to access the personal data processed and to information about the details of processing and sources of personal data. If you have provided us with personal data based on your consent or in connection with the performance of contractual obligations and if it concerns personal data processed automatically you have the right to obtain them in a structured, ordinarily-used and machine-readable format.

Right to rectification, erasure and restriction of data processing. You have the right, without undue delay, to have us rectify inaccurate personal data about you; this also concerns the supplementation of incomplete personal data. You are also entitled to ask us to erase your personal data if we do not have a sufficient legal reason for processing (e.g. if you objected to the processing of personal data for direct marketing purposes). If you so request, instead of erasing the personal data, we will only restrict their processing, i.e. the personal data will only be stored and will not be processed in another manner—without your consent.

Right to object. You have the right, at any time, to object to the processing of your personal data for direct marketing purposes, where the personal data will no longer be processed for this purpose. If you make an objection to the processing of your personal data in other cases where we process the personal data based on our legitimate interests, we will first assess (with regard to your specific situation) whether there are serious legitimate reasons on our part for continuance with processing that prevail over your interests or rights and freedoms, and we will inform you of whether we will comply with your objections or whether we cannot comply with them, and for what reasons.

In what way can you exercise your rights and in what way will we deal with your requests? You are entitled to exercise your rights in any form that comprehensibly states the content of your request, notification or objections, in particular in electronic form sent to info@lexxusnorton.cz. If you ask us to adopt a certain measure, we will provide you with information about the measures taken, without undue delay and in any case within one month of receiving a request; this period can, in necessary cases, be extended by up to two months, of which you must be informed in time.

How can you defend yourself? If you think your rights have been infringed in connection with how we process your personal data, you can make a complaint to the Office for Personal Data Protection (www.uouu.cz). You are also entitled to file a civil law action in court and claim court protection.