

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

What is the purpose and scope of this document?

The purpose of this privacy statement is to inform you about how Rakyta and its subsidiaries (**Rakyta, “we,” “us,” or “our”**) process your personal data when you communicate with us. This Privacy Statement is intended for **individuals other than Rakyta 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 Rakyta’s premises, points of sale, or websites, or who participate in events organized by Rakyta (visitors and guests),
- Persons involved in the provision of services to Rakyta (suppliers),
- Clients and/or individuals interested in Rakyta’s products and services (potential clients),
- Individuals involved in the process of reporting unfair practices,
- Individuals who otherwise cooperate with Rakyta without a basic contractual relationship (third parties).

Who is responsible for processing your personal data?

For the purposes of this Privacy Policy and unless otherwise stated, Rakyta Land Development, a.s., with its registered office at Legionárska 10, 811 07 Bratislava – Staré Mesto district, ID No. 52 595 528, the controller of the processing operations described in this document.

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

- Rakyta Development A, s.r.o., with its registered office at Legionárska 10, Bratislava - Staré Mesto 811 07, ID No.: 55 384 251,
- Rakyta Development B, s.r.o., with its registered office at Legionárska 10, Bratislava - Staré Mesto district 811 07, ID No.: 57 610 827.

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

What personal data do we process?

The personal data described in this Privacy Policy is processed by various departments of Rakyta for various purposes, with the aim of managing your interactions with the company.

We always process your personal data for a specific purpose and process only the 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 our project). Personal data may be processed by various departments of Rakyta and/or project companies, depending on your relationship with these companies.

A more detailed description of how we process your personal data is provided below:

If you are a visitor to Rakyta's premises/sales locations or participate in events organized by Rakyta (visitors and guests)

The Rakyta Rakyta	Why do we process your personal data?	What personal data do we process?
Marketing/Sales	Organizing events, managing your participation in events, and promoting these events in various media.	Video recordings, photographs (including digital photos and video recordings), attendance data (name, company email address), professional role, meal preferences for small events
Office	Ensuring the safe and secure use of office spaces and other real estate	Name, contact details, professional role, license plate number if vehicles are used, CCTV CCTV system
Marketing	To send direct marketing messages (newsletters), to respond to your questions, requests, and inquiries when you contact us via the contact form on the website or via email, and to monitor your behavior and activity on our website.	Through the contact form on our website, we may process your first and last name, email address, and phone number, and, if applicable, your message.

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		<p>We also process your personal data obtained through cookies on our website. You can find more information about these specific practices in our Cookie Policy on our website.</p>
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For the purpose of ensuring security in office spaces/sales locations and other properties, the data controller is the relevant Rakyta project company in the case of the sale of a specific project, and Rakyta Land Development, a.s. in all other cases.

For other processing activities described in this section, the data controller is Rakyta Land Development, a.s.

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

Responsible function of Rakyta	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, last name, phone number, email address, company/employer name
Office	Ensuring the safe and secure use of office spaces and other real estate Receiving and sending mail (including standard packages as well as receiving mail from bailiffs)	Name, contact information, professional role, license plate number if vehicles are used, CCTV footage
Legal aspects	for the purpose 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 information arising from claims
Accounting	Performing accounting-related activities, such as issuing invoices for services and/or products that we have purchased from you as our supplier.	Identification information, contact information, and bank account information account, credit credit , compensation, agreements, and arrangements

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

Responsible Rakyta Rakyta	Why do we process your personal data?	What personal data do we process?
Marketing	If you have expressed interest in any 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, last name, email address, other contact information
Accounting	Performing accounting-related activities, such as issuing invoices for services and/or products you have purchased from us.	Identification data, contact details, bank account information, credit card number, compensation, agreements, and contracts
Sales	For the purposes of pre-sale, sale, lease, contractual and after-sales services that we offer you as one of our clients in the residential real estate sector.	Names, nationality, personal identification data (date of birth, birth number, ID number, contact information, employer and job title, family composition, financial information, agreements and contracts, signature, information about identity documents
Commercial	For the purposes of pre-sale, sale, contractual, and after-sale services that we offer to you as one of our clients.	Names, contact details, job title, signature, information about identity documents, information regarding power of attorney
Legal	In the event of a dispute or conflict between Rakyta 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 purpose of combating fraud and violations of client rights (e.g., AML KYC).	Personal identification data, nationality, job title, contact details, financial data (source of income), information from identity documents, signature
Sales	For the purpose of renting out real estate that you own as a property owner	Names, nationality, personal identification data (date of birth, social security number, contact details, financial information,

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		agreements and contracts, signature, information regarding identity documents
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For 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

Responsible department at Rakyta	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 who is the subject of a report from a whistleblower, we may process your personal data as part of our reporting procedure.	Name, contact information, behavior, and any other data that could be derived from the report.

For the purposes of this processing activity, the controller will be Rakyta Land Development, a.s.

If you cooperate with Rakyta without a contractual relationship (other third parties)

Responsible function at Rakyta	Why do we process your personal data?	What personal data do we process?
Legal aspects	In the event of a dispute or conflict between Rakyta and Rakyta's contractual partners that involves you as a third party	name, contact information, job title, behavior, 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 Rakyta Land Development, a.s.

Processing activities not covered by this privacy statement

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

Any information regarding how we process your personal data concerning:

- The use of cookies on our website—please see our Cookie Policy, which can be found at the bottom of the website <https://rakyta.sk>

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 the sale or rental of real estate.

b) Consent

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

- You contact us through 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 organized by Rakyta, or
- We ask for your consent to be photographed or filmed during events organized by Rakyta.

Whenever we process your personal data based on your consent, you have the right to withdraw your consent at any time and without any adverse consequences by contacting Rakyta at this address:privacy@rakyta.sk . In your email, you should clearly provide sufficient information for 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 Rakyta is subject. Specifically, this applies to 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 to fulfill our obligations under anti-money laundering laws and the Civil Code regarding the finalization of a contract,
- We use your personal data to fulfill our obligations under commercial law, tax laws, and accounting laws.

d) Legitimate Interest of the Controller

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 determined by Rakyta 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 fulfill its purpose.

In general, we will retain personal data for the duration of your relationship with Rakyta. Certain categories of personal data are retained for a relatively shorter period; for example, data contained in CCTV recordings are retained for 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 periods 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 laws).

Below you will find a table providing more information on how long Rakyta retains your personal data. For further information,

please contact us at: privacy@rakyta.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, last name, email address, other contact details, photos, videos	We retain your personal data related 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 .

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		Rakyta retains the contact details and mailing addresses of visitors (and any other individuals 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, connection, browsing session information, etc.) via contact forms (first and last name, email address, phone number, and custom message—optional)	Personal data stored on our web server is retained for 2 years
Records from security cameras	Name, contact details, job title License plate number, if vehicles are used, CCTV recordings (for security purposes in offices, at Rakyta sales locations, and on construction sites)	Up to 72 hours for construction sites and sales locations, unless an accident occurs. In such a case, the retention period will be determined by the competent 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 information, job title, bank account information, 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 not for a period shorter than the statute of limitations to assess tax or a tax difference expires.
Pre-sale, sale, lease, contract management, and after-sale services for clients in the residential real estate sector	Names, nationality, personal identification data (date of birth, birth number, ID card number), contact details, employer and job title, family composition, financial information, agreements and contracts, signature, information regarding identity documents	Purchase agreements and documentation regarding monetary 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.

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		Contact details and mailing addresses of potential clients (and any other individuals who contact the company) are also retained for a maximum of 4 years, unless they are required as evidence to defend against claims.
Dispute , Litigation litigation,Debt	names, contact information, job title, conduct, and any other data arising from allegations	<p>In the event of an impending dispute, the relevant documents are retained for 3 years from the date the claim arose, in the case of claims by individuals, 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.</p> <p>In the event of enforcement during execution proceedings and for an additional 10 years from the date the judgment becomes final</p>
Conducting compliance procedures for potential clients and clients for the purpose of combating fraud and violations of customer rules (e.g., AML KYC).	Personal identification data, nationality, position, contact details, financial data (source of income), information on identity documents, signature	Rakyta retains AML information about 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 Rakyta.

Within Rakyta	<p>The recipients of your personal data are typically Rakyta employees. They may also include temporary workers, independent contractors, interns, or consultants working for Rakyta. If you want to know how departments process your personal data, please refer to the previous sections of this privacy statement.</p> <p>We may also provide your personal data to other companies within the group (listed in the section "Who is responsible for processing your personal data?") for purposes related to the management of the company's operations.</p>
Outside of Rakyta	<p>Under certain circumstances, Rakyta may share your data with third parties. In such cases, your data will be shared with:</p> <ul style="list-style-type: none">- Statutory bodies- IT service providers- Social media platforms- External photo and video suppliers- Digital agencies- Website maintenance providers- Event planning companies- CCTV system providers- Financial and accounting software providers- Financial brokers- Notaries- Providers of utility services for rental apartments- Dispute resolution bodies- Lawyers- Consultants- Certified public accountants- External processors of project documentation- External suppliers of goods and services <p>For more information about the service providers used by Rakyta, please visit: privacy@rakyta.sk .</p> <p>Some of your personal data may be disclosed with your consent.</p>

Rakyta further ensures that third-party service providers who process data on behalf of Rakyta have implemented appropriate contractual safeguards to protect your personal data.

Please note that we may use or disclose your personal data if required 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 forth in this Privacy Policy, your personal data may be transferred to third countries when we use service providers located outside the European Economic Area.

For further details regarding the transfers described above and the appropriate security measures used in connection with such transfers, please visit privacy@rakyta.sk.

What are your rights?

As an individual, you have various rights that you may exercise under certain circumstances regarding the personal data we hold about you. You have the right to access, correct, delete, or restrict the processing of personal data concerning you.

- **Your right of access** – you have the right to request copies of your personal data from us.
- **Your right to rectification**—you have the right to ask us to correct personal data that you believe is inaccurate. You also have the right to ask us to complete information that you believe is incomplete.
- **Your right to erasure** – under certain circumstances, you have the right to ask us to erase your personal data.
- **Your right to restriction of processing** - under certain circumstances, you have the right to ask us to restrict the processing of your personal data.

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- **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 if 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 if it is based on our legitimate interest or the legitimate interest of a third party; in particular, you may object to the processing of your personal data for direct marketing purposes.
- **Your right not to be subject to automated individual decision-making, including profiling** - You have the right not to be subject to a decision based solely on automated processing, including profiling, that produces legal effects concerning you or similarly significantly affects you.

If you wish to submit a request, please contact us [at privacy@rakyta.sk](mailto:at_privacy@rakyta.sk). You do not have to pay any fees to exercise your rights. If you submit a request, we will make every effort to respond to you within a reasonable timeframe.

You also have the right to file 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?

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

Where can you turn to exercise your rights?

If you have any questions or concerns regarding this Privacy Policy, please do not hesitate to contact us [at privacy@rakyta.sk](mailto:at_privacy@rakyta.sk) or send your request to the following address: Legionárska 10, Bratislava - Staré Mesto 811 07.