

PRIVACY NOTICE ON PROCESSING PERSONAL DATA AND YOUR RIGHTS

In case you or third party are/is providing your personal data, we as a data controller or data processor:

- **HBR SFA, s. r. o.**, registered seat: Mlynské nivy 16, Bratislava - mestská časť Staré Mesto 821 09, Company ID: 44 127 103, registered with the Commercial Register of the District Court Bratislava I, section: Sro, insert No.: 52335/B
- **HB Reavis Real Estate Investment Fund**, registered seat: 1B rue Jean Piret, L-2350 Luxembourg, Company ID: B161180 represented by HB Reavis Investment Management S.à r.l. registered seat: 1B rue Jean Piret, L-2350 Luxembourg, Company ID: B161176,
- **HB Reavis Investment Management S.à r.l.**, registered seat: 1B rue Jean Piret, L-2350 Luxembourg, Company ID: B161176 (hereinafter as “**HB Reavis**”)

would like to inform you about the processing of your personal data and we also inform you of your rights related to the said processing.

HB Reavis is part of the HB Reavis Group, with its headquarters in Luxembourg (hereinafter referred to as the „HB Reavis Group“) due to which the reference to HB Reavis Group may be found in the Privacy Notice.

We take the privacy and security of your personal information very seriously and will only use your personal information as set out in this Privacy Notice or as we may otherwise inform you from time to time.

Depending on the nature of our relationship with you, we will collect various types of personal information about you which may include some or all the following purposes:

1. Conclusion of contract
2. Performance of customer due diligence
3. Reporting obligation
4. Contact persons
5. Evidence of incoming and outgoing mails
6. Mutual communication
7. GDPR compliants

1. Conclusion of contract

What is our purpose for the processing of your personal data?

The personal data provided by you will be used for the purpose of ensuring the negotiation and conclusion of the contract, including our pre-contractual relationships.

What is our legal basis for the processing of your personal data?

The legal base for processing of your personal data in connection with conclusion of contract is the performance of a contract (i.e., the personal data is provided as part of pre-contractual relations leading to conclusion a contract) under Article 6 (1) (b) of GDPR. In case of failure to provide us with the personal data, we cannot enter a contract with you.

What kind of personal data do we process?

Name, surname, e-mail, date of birth, residential address, citizenship, identification document (such as passport, driving license, utility bill and bank statement), function, signature, financial information (such as taxes, wealth, source of finances etc.)

For how long we will process your data?

Since the statute-barred period applies, HB Reavis is obliged to store your personal data 5 years after the termination of the contractual relationship with you.

2. Performance of costumer due diligence

What is our purpose for the processing of your personal data?

The personal data provided by you will be used for the purpose of performance of customer due diligence (CDD) procedures are required to comply with regulation, especially in Anti-money laundering and counter-terrorism financing (AML-CTF), including for example your identification and/or verifying your identity and other data required by law.

What is our legal basis for the processing of your personal data?

Legal basis for processing of your personal data in connection to CDD procedure is legal obligation under Article 6 (1) (c) of GDPR.

What kind of personal data do we process?

Personal data provided in the company register extract, shareholder register, recent shareholding structure chart of the Company, showing the ultimate beneficial owner and % of holdings, due diligence questionnaire, copy of the articles of association/deed/act of incorporation (mainly Name, surname, date of birth, residential address, e-mail address, telephone number, fax number, title, date of birth, place of birth, birth number, residential address, citizenship) and in the certified copy of a valid ID (such as passport or driving license), function, signature.

For how long we will process your data?

Since the statute-barred period applies, HB Reavis is obliged to store your personal data from 5 to 10 years after the termination of the contractual relationship with you or after the completion of the transaction. Certain details and correspondence may be retained until the time limit for claims, in respect of the pre-contractual or contractual relationship has expired or to comply with regulatory requirements regarding the retention of such data.

3. Reporting obligation

What is our purpose for the processing of your personal data?

The personal data provided by you will be used for the purpose of provision of obligatory or required reports to competent authority.

What is our legal basis for the processing of your personal data?

Legal basis for processing of your personal data in connection with reporting obligation is legal obligation under Article 6 (1) (c) of GDPR.

What kind of personal data do we process?

Name, surname, e-mail, date of birth, residential address, citizenship, financial information, and other information required by law.

For how long we will process your data?

Since the statute-barred period applies, HB Reavis is obliged to store your personal data 5 years after the termination of the contractual relationship with you.

4. Contact persons

What is our purpose for the processing of your personal data?

We process your personal data to ensure that our contractual obligations arising from the contract with you or a third party, of which you are in the position of a contact person or a signatory on behalf of the contractual party, are effectively fulfilled and to be compliant with legal obligations under local law. Since we conducted the contract with your or the third party, we need to process your personal data to ensure effective, flawless, and clear communication as well as to ensure fulfillment of our contractual obligations and legal obligations (tax and accounting) towards you or the third party. This processing also applies to other legal acts than contracts as for example power of attorney.

What is our legal basis for the processing of your personal data?

We process your personal data based on legitimate interests under Article 6 (1) (f) of GDPR. When we handle the tax and accounting matters, we process your personal data based on a legal obligation under Article 6 (1) (c) of GDPR. If you or the third party fail to provide us with your personal data, we cannot fulfill our legal obligations.

What kind of personal data do we process?

Title, name, surname, position, department, personal and employee number, business area, place of work, signature, e-mail, phone and fax number and identification information of your employer (incl. identification information of the entity on which behalf you act).

For how long we will process your data?

Once we no longer need your personal data for the purposes for which we processed it, we will delete your personal data or archive it for the period of time specified by law or the archiving plan

5. Evidence of incoming and outgoing mail

What is our purpose for the processing of your personal data?

We process your personal data for the purpose of incoming and outgoing mail evidence.

What is our legal basis for the processing of your personal data?

We process your personal data based on legitimate interests under Article 6 (1) (f) of GDPR.

What kind of personal data do we process?

Name, surname, address, telephone number and e-mail.

For how long we will process your data?

Once we no longer need your personal data for the purposes for which we processed it, we will delete your personal data or archive it for the period of time specified by law or the archiving plan.

6. Mutual communication

What is our purpose for and legitimate interest in processing your personal data?

Our philosophy is to always be open and transparent. This includes being open to communication from any person interested in us. To fulfil this goal, we created contact forms that can be used to contact us. Additionally, we have also published the email addresses of employees working for us so you can contact them at any time with any questions related to our real estate fund or business activities and the business you may have. However, to ensure effective, flawless, and clear communication, we must process some of your personal data.

Moreover, when executing the sales process with our (potential) clients we strive to maintain very effective and transparent communication canal. To fulfil this purpose, we use the CRM database filled with contact data (including personal data) of our (potential) clients or their employees. We do this to ensure effective and flawless communication with the (potential) clients and to build a database consisting of all our business partners.

What is our legal basis for the processing of your personal data?

If you contact us or any employee via email or a web-based form, we process your personal data based on the legitimate interests under Article 6 (1) (f) of GDPR.

What kind of personal data do we process?

Name, surname, email address and phone number. For the purposes of the CRM database, in addition to the aforementioned data, we also process job title and employer identification data.

How long do we store your personal data?

We keep your personal data until you unsubscribe from our contact database.

7. GDPR complaints

What are our purposes for the processing of your personal data?

We strive to protect your privacy as much as possible, and therefore we process your personal data in compliance with GDPR and all other relevant laws. However, if you disagree with the way we handle your personal data, you can exercise your rights via our Data Protection Officer. To ensure that your complaint is handled, some of your personal data has to be processed.

What is our legal basis for the processing of your personal data?

Your personal data is processed while handling your complaint in accordance with Article 6 (1) (c) GDPR, i.e., the processing is necessary for compliance with a legal obligation to which our company is subject.

What kind of personal data do we process?

Personal data provided by you when submitting the complaint (such as name, surname, email, phone number, etc.).

How long do we store your personal data?

We store your personal data strictly during the time necessary to deal with the complaint.

With whom do we share your personal data?

Based on the various agreements with the third parties acting as our processors or separate controllers, we provide your personal data to the following companies and to the following extent:

- **CF Fund Services S.A.**, having its registered seat at: 1b, rue Jean Piret L-2350 Luxembourg, ID No.: B143316, as separate controller during provision of the following services: Central Administrator, Registrar and Transfer Agent and Listing Agent
- **Crestbridge Management Company S.A.**, having its registered seat at: 1 Boulevard de la Foire, L-1528 Luxembourg, ID No.: B159082, as separate controller during provision of the following services: Domiciliation agent and Distributor. As processor while providing administration and other services.
- **Law & Trust - advokátska kancelária, spol. s r.o.**, having its registered seat at: Mlynské nivy 16, Bratislava - mestská časť Staré Mesto 821 09, ID No.: 35 821 477, as separate controller while providing law services
- **HB Reavis Group s. r. o.**, having its registered seat at: Mlynské nivy 16, Bratislava - mestská časť Staré Mesto 821 09, ID No.: 50 588 427, as processor while providing marketing services.

We may provide your data to other company belonging to HBRG group. We may be obliged to provide your personal information to public authorities, in particular regulator, courts, law enforcement agencies (such as the police, prosecutors, etc.) only to the extent necessary and within the limits of the law.

From whom did we get the data?

We get personal data from you or the third party we have entered into a contract with (or other relevant legal act) or that stated your personal data in the mail.

Do we use automated individual decision-making?

No, we do not use automated individual decision-making.

Do we transfer your personal data to third countries?

Your personal data are processed within the territory of the European Union. Your personal data can be processed by a country outside of European Union if this third country has been confirmed by the European Commission as a country with adequate level of data protection or if other appropriate data protection safeguards exist (for example, binding corporate privacy rules or EU standard data protection clauses).

Other information:

Once we no longer need your personal data for the purposes for which we processed it, we will delete your personal data or archive it for the period of time specified by law or the archiving plan.

What are your rights?

Your rights as a data subject are stated below. Please note that the exact conditions to exercise these rights are set out in detail in Chapter III of GDPR, while in a particular circumstance not all rights may be exercised. You have following rights:

- Access to personal data we process about you
- Rectification of incorrect or inaccurate personal data and add incomplete personal data
- Restriction, i.e. blocking of processing of your personal data
- The deletion of personal data in case the purpose absence or unauthorized data processing
- Submission of an objection to the processing of personal data if you believe that our data processing is not justified
- Be excluded from automated decision-making
- Listing of personal data in a structured and machine-readable format or for another controller

- Revocation of consent to the processing of personal data
- To lodge a complaint with the supervisory authority

How can you exercise your rights?

electronically: dataprivacy@hbreavis.com

In writing to the address: HBR SFA s.r.o., to attn.: compliance department, Mlynské nivy 16, Bratislava - mestská časť Staré Mesto 821 09

Telephone: +421 918 723 243

We strive to protect your privacy as much as possible and therefore we process your personal data in compliance with GDPR and all other relevant laws. However, if you disagree with the way we handle your personal data, you can exercise your rights via our Data Protection Officer at:

Data protection officer's contact: Erika Wild, contact point at Twin City C, Mlynské Nivy 16, 821 09 Bratislava, Slovak Republic, tel. +421 918 723 243, email: dataprivacy@hbreavis.com

Or you can file a complaint in supervising authority regarding the processing of your personal data by the HB Reavis. Your local supervisory authority may be found at <https://ec.europa.eu/digital-single-market/en/news/list-personal-data-protection-competent-authorities>