

PRIVACY POLICY MARLO DEVELOPMENT s.r.o.

In these principles of personal data processing and protection, we inform you about how we process (use) and protect your personal data that we have at our disposal. When we refer to "you", we mean you as our customers and potential clients interested in our services, especially if you have entered into a contract with us (brokerage, reservation, etc.), if we are facilitating the purchase of real estate for you, or if you have contacted us expressing interest in our services (e.g. real estate purchase) or promotions.

BASIC TERMS

- "MARLO" is the company MARLO DEVELOPMENT s.r.o., Business ID: 01626230, with its registered office at Vodičkova 710/31, Nové Město, 110 00 Prague 1. When we refer to "us" in these principles of personal data processing and protection, we are referring to MARLO.
- The "MARLO Group" includes all companies for which MARLO is the joint controller, namely the following companies: MARLO a.s., BOTEX TRADE s.r.o., MARLO KH s.r.o., MARLO MALÍN s.r.o., MARLO MIROVICE s.r.o., MARLO ŘÍČNÍ s.r.o., MARLO VINICE s.r.o., MARLO VYSOČANY s.r.o., MARLO ŽIŽKOV s.r.o., MARLO VINOHRADY s.r.o., MARLO STODŮLKY s.r.o., MARLO OTG s.r.o., MARLO REAL s.r.o., HELIWAY s.r.o.
- "Personal data" shall mean all information that identifies you or on the basis of which you can be identified, as well as information that reveals information about you (your identity, activities, property, etc.).
- "Processing" of personal data shall mean any operation or set of operations with your personal data or sets of your personal data, which are performed with or without the use of automated processes, such as collection, recording, organization, structuring, storage, adaptation, or alteration, retrieval, consultation, use, disclosure by transmission, dissemination, or otherwise making available, alignment or combination, restriction, erasure or destruction. Processing is either wholly or partially automated processing of your personal data, and non-automated only if personal data are included in a record or are intended to be included therein.
- You are our "customer" if we have or have had a brokerage or other contractual relationship with you for the provision of our services, or if you are a contracting party in a transaction we facilitate or have facilitated. BASIC PRINCIPLES Personal data as a value. We consider your personal data as an important value and handle them accordingly. When processing personal data, we comply with Regulation (EU) 2016/679 of the European Parliament and of the Council, the General Data Protection Regulation, and other applicable legal regulations. What are the basic rules? When processing personal data, we follow the following basic rules:
 - Legality, fairness, and transparency: We process your personal data towards you fairly and in a lawful and transparent manner.
 - Purpose limitation: We collect your personal data exclusively for specific, explicitly stated, and legitimate purposes, and we do not process these personal data further in a manner that is incompatible with these purposes.

- Data minimization: We process personal data only to the extent that is adequate, relevant, and limited to what is necessary in relation to the purposes for which personal data are processed.
- Accuracy: We ensure that the personal data we process are accurate and, if necessary, updated. We take all reasonable measures to promptly erase or correct any personal data that is inaccurate, taking into account the purposes for which they are processed.
- Storage limitation: We store your personal data in a form that allows your identification for no longer than is necessary for the purposes for which personal data are processed.
- Integrity and confidentiality: We ensure the protection of your personal data that we process. We process your personal data in a way that ensures their proper security, including protection against unauthorized or unlawful processing and against accidental loss, destruction, or damage. We use advanced physical and electronic security measures.
- Localization: All your personal data is stored in the Czech Republic, and we do not transfer it to countries outside the European Union. What else to consider? We generally process your personal data for two purposes: contract management and marketing and business purposes. Both of these purposes and the rules we apply to them are detailed below. Certain data that may be identifiable under certain circumstances are also products of the use of cookies and web beacons technologies; therefore, we also specify the rules applicable to these technologies below.

PERSONAL DATA FOR CONTRACT MANAGEMENT AND CONTRACTUAL RELATIONSHIPS

We process personal data contained in contracts that you have entered into with us, as well as personal data resulting from the performance of these contracts. This includes, in particular (but not exclusively), contact and identification details, contract-related data, which may also include information about your financial situation to some extent, and data about the course of the contractual relationship (billing, etc.), including business communication with you. Please note that a contract may not only be concluded in writing but may also be based on an oral agreement.

Why do we need this personal data? It is natural that we must process contractual personal data in order to fulfill our obligations under contracts and to exercise our rights under these contracts and to fulfill related legal obligations. For example, under the legislation on measures to prevent the legalization of proceeds from criminal activities and the financing of terrorism, we are required to identify our customers in certain cases and to carry out certain control measures; we are required to keep the relevant documents for 10 years.

Where do we obtain your personal data from? We obtain personal data intended for contract management and contractual relationships primarily from you, but depending on the circumstances, we may also receive them from another source (e.g., from your contracting partner with whom you are entering into a real estate purchase agreement, or from the land register). We always proceed transparently in this regard.

What if a contract has not been concluded or will not be concluded at all? We may also process your personal data before the conclusion of a contract in order for the contract to be properly concluded. If a contract is not concluded due to failure to reach an agreement or for any other reason, we will continue to process your personal data to the extent necessary to address pre-contractual issues and related liability, including the fulfillment of related legal obligations.

How long do we process personal data? We process (store) personal data for such a period during which they may be legally relevant for the implementation of the respective contractual relationship, i.e., until the expiry of applicable statutory limitation, preclusion, complaint, retention, and other similar periods established by legal regulations or agreements between the contracting parties, up to the expiry of the last of these periods; in a specific case, the period depends on the assessment of the respective contractual relationship; however, it is generally not longer than 10 years from the completion of the contractual relationship. In the case of planned but unrealized contractual relationships, the data are processed until the relevant limitation periods relating to pre-contractual liability expire.

MARKETING AND BUSINESS PERSONAL DATA

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

- Firstly, to inform our customers and other individuals who may be interested about our offers and news by sending electronic newsletters and other commercial communications, and to individually inform our customers and other interested individuals about our offers by phone, email, or other similar means of communication; and
- Secondly, to personalize our communication with you when establishing and fulfilling a contractual or business relationship or communication with you (business history, etc.). We process personal data for the purpose of contacting you with offers or other commercial communications only when there is a reasonable assumption that you are interested in our offers; this can be assumed especially if you are or have been our customer. We process personal data for the purpose of personalizing communication only if you have had business contact with us (e.g., completing a specific order or showing interest in such an order).

When can we send commercial email communications? We respect the rule that using your email address to send commercial communications is possible only if you have provided it to us as our customer or if you have given us your consent to use your email address for this purpose. You can revoke your consent at any time; for the form in which this can be done, see the section "Your Rights". In any case, in each commercial email communication, we provide a simple and clear option to refuse further commercial communications by electronic opt-out.

What personal data do we process for this purpose? These are the following types of personal data (in specific cases, not all types of personal data listed may be processed):

- Identification and contact personal data (name, address, email address, phone number, etc.);
- Your personal characteristics in relation to our (potential) cooperation (gender, language, etc.);
- Your profile personal data in relation to our cooperation (history and progress of business relationships, including your instructions for the purposes of providing brokerage services, subject of purchase, subject of demand, participation in MARLO events, etc.);

- Data enabling the personalization of communication with you (communication history, referrals, etc.). We create customer or potential customer profiles from some or all of the processed personal data, which we use for the described purposes. As marketers and business entities, we will never process personal data that reveal your racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, genetic personal data, biometric personal data, or data concerning your health, sex life, or sexual orientation.

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

- Our contractual relationships with you;
- Inquiries you address to us (via online forms, real estate portals, or social networks, by phone, etc.);
- Through referrals from our customers (usually in cases where you are interested in purchasing real estate and you contact our customer, who refers you to us as a broker);
- On selected occasions, from publicly available sources (e.g., land register). Legal basis for processing personal data and the right to object. The legal basis for processing your personal data is our legitimate interests in using the data for marketing and business purposes in the interest of maintaining and developing business contacts and business activities in general.

You have the opportunity to object to the processing of your personal data for marketing and business purposes. If you object to the use of your personal data for sending commercial communications or other forms of direct marketing, we will stop further processing for these purposes without further ado. If you object to the use of your personal data for personalizing communication with you, we will assess, based on the reasons for your objection (considering your specific situation), whether there are compelling legitimate grounds on our side for continuing the processing that override your interests, rights, and freedoms, and we will inform you whether we will comply with the objection or that we cannot comply with it and for what reasons. For the form in which objections can be made, see the section "Your Rights".

How long do we process personal data? We process (store) personal data for contacting you with our offers or other commercial communications for as long as it can be reasonably assumed that you are interested in our offers, unless you have previously objected to such processing. We process personal data for personalizing communication for up to 10 years from the date of the last business contact with you.

COOKIES AND WEB BEACONS

What are cookies and how do we use them? On our websites (modernimalin.cz, marlo.cz, and others operated by us), we use cookie technologies, which means storing certain text files containing data about access to the websites through an internet browser on your computer, so that when you revisit the websites, the stored data is sent again to our web server. Cookies are used to technically ensure the correct functioning of the websites, to personalize the settings of the websites, and to improve the user experience, including storing user preferences. We may also use cookies to tailor advertising and track website visits.

What are web beacons and how do we use them? We may also use web beacon technologies, both on our websites and in sent email messages. Web beacons are small graphic elements (data files, pixel tags) that are downloaded from our web server to track email reading, website visits, and user behavior on them, and subsequently personalize electronic services for users (including personalized advertising).

On what basis do we use cookies and web beacons and what can you do? The circumstances we describe above (personalizing settings and tracking website visits, customizing advertising, tracking interest in our messages) represent our legitimate interests in improving the services we provide. In our opinion, these activities are also beneficial to you. However, if you do not wish us to use cookies and web beacons with respect to you, you can prevent it. Upon your first entry to the websites through a specific web browser, you will be asked to consent to the use of cookies; the technology will only be used if you give consent. You can withdraw your consent to the use of cookies at any time, which you can most easily do by deleting cookies in your web browser. You also have the option to disable storing cookies on your computer or the sending of requests to download web beacons by adjusting the appropriate settings in your web browser. Please note that we are always authorized to use technical cookies, which are necessary to ensure, in particular, the proper functioning and security of the websites.

GOOGLE SIGNALS

We use the Google Signals service, which allows for better personalization of advertising messages delivered by Google Ads, if you are logged into a Google user account. If you consent to the use of advertising cookies on our websites, Google Signals will also be activated automatically. No identification. Personal data obtained through cookies (including Google Signals) and web beacons are not used for your identification.

TRANSFER OF PERSONAL DATA TO THIRD PARTIES (RECIPIENTS)

Whom do we transfer personal data to?

Your personal data is confidential to us. With the exceptions described below, we do not transfer any personal data to third parties, either directly or indirectly (by providing access). We do not trade in personal data.

MARLO Group

We may transfer personal data to entities that are part of the MARLO Group for processing for the purpose for which we have personal data. The recipient will process the personal data it receives exclusively in accordance with the rules set by MARLO, and we are responsible for the proper processing of personal data by the recipient.

Partners

We may transfer personal data to entities that process personal data on our behalf or provide us with services that necessarily involve access to personal data. These are mainly entities that provide us with information technology services (e.g., hosting or web hosting), database services, accounting services, tax advisory services, or legal services. Cooperation with these entities is always strictly operational. The recipients do not process personal data independently, but exclusively according to our instructions. We are responsible for ensuring that the recipients do not misuse the personal data made available to them and that they have agreed to the obligations of integrity and confidentiality of personal data and other obligations that need to be agreed upon according to applicable legal regulations.

Financial Advisors

If you are our customer, we may transfer your contact details and information concerning the assessment of your financial needs to one or more financial advisors if it can be reasonably assumed that you need to use financial advisory services in connection with the transaction we mediate. The financial advisor is authorized to use the transferred personal data solely for the purpose of contacting you with a specific offer of financial services or to address your financial situation (either directly or indirectly through us). The transfer of personal data of this type occurs in connection with our legitimate interests in providing successful brokerage services. You have the right to object to the transfer of your personal data to financial advisors, and if you do so, we will ensure that the financial advisor does not process your personal data. We are responsible for ensuring that the financial advisors do not misuse the personal data made available to them and that they have agreed to the obligations of integrity and confidentiality of personal data and other obligations that need to be agreed upon according to applicable legal regulations.

Agreed Transfers

We are also authorized to transfer personal data to third parties if you give your consent, subject to the conditions of the consent given. You can withdraw your consent at any time; for the method by which you can do so, see the section "Your Rights." Transfer to fulfill legal obligations and necessary by nature of the matter. Your personal data may also be transferred to third parties if necessary to fulfill our legal obligations (especially concerning public authorities) or if necessary by nature of the matter, especially to fulfill a contractual relationship of which you are a party.

YOUR RIGHTS

Right to information

You have the right to obtain confirmation from us whether we process your personal data or not. If so, you have the right to access the processed personal data and to be informed about the details of the processing and the sources of personal data. If you have provided us with personal data based on your consent or in connection with the fulfillment of contractual obligations, and

if it concerns personal data processed automatically, you have the right to receive them in a structured, commonly used, and machine-readable format.

Right to rectification, erasure, and restriction of data processing

You have the right to have your inaccurate personal data corrected without undue delay; this also applies to the completion of incomplete personal data. You are also entitled to request that we erase your personal data if we do not have a sufficient legal reason for processing it (e.g., if you object to the processing of personal data for direct marketing purposes). If you request it, instead of erasing personal data, we will only restrict their processing, i.e., personal data will only be stored and will not be processed in any other way without your consent. Right to object. You have the right to object at any time to the processing of your personal data for direct marketing purposes, with the consequence that personal data will no longer be processed for this purpose. If you object to the processing of your personal data in other cases where we process personal data based on our legitimate interests, we will first assess (with regard to your specific situation) whether there are compelling legitimate reasons on our side for continuing the processing, which outweigh your interests or rights and freedoms, and we will inform you whether we will comply with your objections or that we cannot comply with them and for what reasons.

How can you exercise your rights and how will we handle your request? You are entitled to exercise your rights in any form that clearly conveys the content of your request, notification, or objections, especially electronically to gdpr@marlo.cz. If you ask us to take a certain action, we will provide you with information about the actions taken without undue delay and in any case within one month of receiving the request; this deadline may be extended in necessary cases for up to two months, of which you will be informed in a timely manner.

How can you defend yourself? If you feel that your rights concerning the processing of your personal data are being violated, you can contact the Office for Personal Data Protection (www.uoou.cz). You also have the right to file a civil action with the court and seek judicial protection.