

Information on selected processing of personal data by the Companies of the CPI PG

Below you will find information on the processing of personal data by the companies of CPI PG (the “**CPI PG Companies**”) provided in accordance with 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 (the “**Regulation**”) and other related laws and regulations governing the protection of personal data. The CPI PG Companies, as personal data controllers, processes personal data as described further in this document.

Processing of Personal Data

The personal data is processed by the CPI PG Companies only to the extent necessary and for the time necessary to achieve a particular purpose.

1.

Purposes of processing

Conclusion and performance of lease agreements.

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| Processing purpose´s description | Keeping records of tenants and contact persons, signing of contracts and maintaining the register of contracts, communicating with tenants and obtaining feedback, maintaining the register of powers of attorney, bookkeeping, invoicing, collecting reports and turnover data, processing bank statements, maintaining the registers of bank guarantees, deposits and insurance contracts, receivables management, received mail records, registration of car registration plates of tenants, keeping records of tenants' training. |
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| Legal basis | The legitimate interest of the parties or an agreement with the data subject. |
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| Categories of personal data | Contact details, bank details, identification details for signing contracts, attendance sheets from training. |
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| Categories of personal data subjects | Employees of tenants, tenants' representatives, employees of CPI PG Companies, employees and representatives of insurance companies and bank guarantees providers. |
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| Source of personal data | The other contracting party. |
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| Categories of personal data recipients | CPI PG Companies, property managers, and other companies providing services related to the particular real estate property. |
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| Duration of personal data storage | For the duration of the lease agreement and subsequently for ten years to defend legal claims. Accounting documentation - for ten years from issuing a document. |
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2.

Purposes of processing

Management and use of the database of existing and future tenants and business partners in information systems.

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| Processing purpose 's description | Regular communication with tenants and business partners. |
| Legal basis | The legitimate interest of CPI PG Companies or subject consent granted. |
| Categories of personal data | Name, surname, phone number (mobile), email, position, company name, postal address. |
| Categories of personal data subjects | Employees and statutory representatives of tenants/business partners. |
| Source of personal data | The other contracting party. |
| Categories of personal data recipients | CPI PG Companies, property managers and other companies providing services related to the particular real estate property. |
| Duration of personal data storage (as long as at least one of the following options is valid) | <p>In the case of existing tenants and business partners, for the duration of the contract, and subsequently for a period of ten years.</p> <p>In the case of future tenants, for the duration of the so-called HOT-Lease (preliminary agreement on basic lease conditions), and subsequently for ten years.</p> <p>If consent is granted for the duration of the consent.</p> <p>In other cases (no contract is signed, no consent is given) for the duration of the negotiation of the contract with potential tenants/business partners, and subsequently for five years.</p> |

3.

Purposes of processing

Tenders, conclusion and fulfilment of Supply Contracts.

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| Processing purpose 's description | Identification of potential services or products suppliers, sending a request, collecting offers from suppliers, contract negotiation, signature and contracts records, keeping records of suppliers and their contact persons, communication with suppliers and receiving feedback, evidence of invoices, evidence of full powers, management of received mail. |
| Legal basis | The legitimate interest of CPI PG or an agreement with the data subject. |
| Categories of personal data | Contact details, education, bank details, identification data for signing the contract. |
| Categories of personal data subjects | Employees and representatives of suppliers, employees of CPI PG Companies. |
| Source of personal data | The other contracting party, ARES register. |
| Categories of personal data recipients | CPI PG Companies, property managers and other companies providing services related to the particular real estate property. |
| Duration of personal data storage | Contractual documentation - for the duration of the contract and subsequently for ten years to defend legal claims. Accounting documentation - for ten years after document issue. For five years after the end of the selection process in case a vendor is not selected. |

4.

Purposes of processing

Provision of public wi-fi.

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| Processing purpose 's description | Providing Internet access to visitors. |
| Legal basis | The legitimate interest of CPI PG Companies to operate a public wi-fi network. |
| Categories of personal data | Name, surname, email, identification and technical addresses of the connected device (IP address, MAC address, IMEI, UDID, etc.). |
| Categories of personal data subjects | Visitors. |

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| Source of personal data | Connected devices. |
| Categories of personal data recipients | External provider of connection. |
| Duration of personal data storage | Maximum of 30 days. |

5. Purposes of processing **Events, competitions and loyalty programs organization, newsletters distribution.**

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| Processing purpose 's description | Keeping records of existing and potential customers for the communication purposes, offering products, presentations of shopping centres, discounts and offers. |
| Legal basis | Subjects consent granted or legitimate interest of a controller in case of events. |
| Categories of personal data | Name, surname, title, email, phone, address, age, date of birth, gender, location, audio video records or events photos. |
| Categories of personal data subjects | Visitors, event participants, suppliers, subscribers, persons under 15 years, contractors, tenants employees. |
| Source of personal data | Physical persons. |
| Categories of personal data recipients | CPI PG Companies, property managers and other companies providing services related to the particular real estate property. |
| Duration of personal data storage | For consent period, 3 years from the event date. |

6. Purposes of processing **Operation of the CCTV system.**

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| Processing purpose 's description | Recording footage from cameras installed for security reasons. |
| Legal basis | The legitimate interest of CPI PG Companies in the protection of property and physical persons health. |
| Categories of personal data | Video recordings of people and vehicles in the areas monitored by CCTV. |
| Categories of personal data subjects | Visitors, employees, and other persons. |

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| Source of personal data | CCTV system. |
| Categories of personal data recipients | CPI PG Companies, property managers, and other companies providing services related to the particular real estate property. |
| Duration of personal data storage | Maximum of 7 14 days. |

7.

Purposes of processing

Registration of accesses via reception, building and parking space access systems.

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| Processing purpose 's description | Evidence and control of access to internal premises and parking spaces or garages of the CPI PG Companies. |
| Legal basis | The legitimate interest of CPI PG Companies in the protection of property and physical persons health. |
| Categories of personal data | Name, surname, technical ID of access cards, car registration ID. |
| Categories of personal data subjects | Visitors, employees and other persons. |
| Source of personal data | Physical persons. |
| Categories of personal data recipients | CPI PG Companies, property managers, and other companies providing services related to the particular real estate property. |
| Duration of personal data storage | 6 months form data recording. |

8.

Purposes of processing

Conclusion and processing of Agreements with Customers.

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| Processing purpose 's description | Communication with customers, processing of demands, conclusion and processing of contracts and orders, invoicing, receivables management, issuing of delivery notes, bookkeeping, processing of bank statements, registration of contact persons, keeping of received mail. |
| Legal basis | The legitimate interest of the parties or an agreement with the data subject. |
| Categories of personal data | Contact details, bank details, identification details for signing contracts and orders. |

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| Categories of personal data subjects | Customers and their statutory members and employees. |
| Source of personal data | The other contracting party, ARES register. |
| Categories of personal data recipients | CPI PG Companies. |
| Duration of personal data storage | For the duration of the agreement and subsequently for ten years to defend legal claims. In other cases (no contract is signed) for the duration of the negotiation of the contract with potential business partners, and subsequently for five years. |

9.

Purposes of processing

Keeping Land Records.

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| Processing purpose 's description | Keeping records of existing lease contracts, easements, purchase contracts for land, related payments, registration of contact persons. |
| Legal basis | The legitimate interest of CPI PG Companies. |
| Categories of personal data | Contact details, identification details for signing contracts, bank details. |
| Categories of personal data subjects | Contract partners, landowners and users who are adjacent to the registered land. |
| Source of personal data | The other contracting party, LPIS and RUIAN Registers. |
| Categories of personal data recipients | CPI PG Companies. |
| Duration of personal data storage | For the duration of the agreement and subsequently for ten years to defend legal claims. Purchase contracts of a property nature and of serious importance shall be kept permanently as archival records. In other cases (no contract is signed) for the duration of the negotiation of the contract with potential business partners, and subsequently for five years. |

10. Purposes of processing **Conclusion and performance of real estate sale contracts.**

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| Processing purpose´s description | Keeping records of sold properties owners and contact persons, signing and registration of contracts, communication with property owners, fulfillment of obligations arising from sales contracts. |
| Legal basis | The legitimate interest of the contracting parties or contract with the data subjects where applicable. |
| Categories of personal data | Identification personal data in contracts: name, surname, title, date of birth, personal ID number (only for older contracts), permanent address. Contact details: name, surname, address and property identification, telephone number, e-mail address. |
| Categories of personal data subjects | Property owners and their representatives. |
| Source of personal data | Data subjects or their representatives. |
| Categories of personal data recipients | CPI PG Companies. Persons (legal and physical) providing client service (including complaints settling) to property owners. |
| Duration of personal data storage | For the duration of the warranty period and thereafter for ten years to defend legal claims. |

Additional information related to the processing of personal data including, amongst other things, a list of rights in relation to the processing of personal data, the manner in which such data are processed and contact details of the CPI PG Companies´ Personal Data Protection Officers are listed in the CPI Privacy Policy located here: <https://cpipg.com/data-protection-policy-en>.