

INFORMATION ON THE PROCESSING OF PERSONAL DATA

pursuant to Articles 12, 13 and 14 of Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (hereinafter referred to as the "GDPR") and Act No. 18/2018 Coll. on Personal Data Protection and on Amendments and Supplements to Certain Acts, as amended

This information explains how Axis real, spol. s r.o. processes the personal data of clients, prospective buyers and tenants, property owners, contracting parties, their representatives, contact persons and other natural persons when providing real estate and related services.

If the client is a legal entity, this information applies to natural persons acting on its behalf, its contact persons, authorised representatives, ultimate beneficial owners and other natural persons whose personal data is processed in connection with the business relationship.

Important: This document is intended to fulfil the controller's information obligation and does not constitute consent to the processing of personal data. If a particular processing operation is based on the data subject's consent, such consent will be requested separately.

1. Controller

The controller of personal data is:

Axis real, spol. s r.o.

Bosákova 5/A, 851 04 Bratislava

Company ID No.: 35 851 317

registered in the Commercial Register of the Bratislava III Municipal Court, Section Sro, Insert No. 28147/B

E-mail: axisreal@axisreal.sk

Telephone: 0948 100 222

Website: www.axisreal.sk

2. Personal data we process

Depending on the circumstances of the particular case, we may process in particular:

- **identification data** – first name, surname, title, date of birth, personal identification number, nationality and identity document details, where necessary to comply with a legal or contractual obligation;
- **contact details** – permanent or other residential address, correspondence address, telephone number and e-mail address;
- **representation data** – details of an authorised representative, statutory body, contact person or other authorised person;
- **data concerning the property and the legal relationships relating to it** – ownership, co-ownership shares, encumbrances, technical data, and rights and obligations connected with a transfer or lease;
- **contractual and transaction data** – data contained in brokerage, reservation, sale, lease and other agreements, handover reports, applications for registration in the Real Estate Cadastre and related communications;
- **payment and billing data** – bank account number and data concerning payments, invoicing, deposits, commissions and receivables;
- **data required to comply with AML obligations** – data concerning the client and the client's identification, the ultimate beneficial owner, the purpose and nature of the business relationship and, depending on the circumstances, the source of funds;
- **communication data** – the content of communications and data required to deal with enquiries, viewings, complaints, claims and legal proceedings;
- **technical data** – in particular timestamps, transaction identifiers, records of electronic signatures or approvals, IP addresses and security logs to an appropriate extent.

3. Purposes and legal bases of processing

3.1 Pre-contractual negotiations and the provision of real estate services

We process personal data for the purpose of communicating with a prospective client or client, preparing an offer, arranging viewings, negotiating the terms of a transaction, preparing and concluding a brokerage, reservation or other agreement, and performing obligations arising from a concluded agreement.

Legal basis: Article 6(1)(b) GDPR – taking steps at the request of the data subject prior to entering into a contract and performance of a contract.

3.2 Preparation and completion of a real estate transaction

We process data to the extent necessary to prepare or arrange reservation agreements, sale and lease agreements, amendments, handover reports, applications for registration in the Real Estate Cadastre, and supporting documents for lawyers, notaries, banks, the Real Estate Cadastre, property managers and other persons involved in the transaction.

Legal basis: Article 6(1)(b) GDPR where the data subject is our client or a contracting party; Article 6(1)(f) GDPR where the data relates to an owner, prospective buyer or tenant, the other contracting party, a representative or contact person and its processing is necessary for the safe and proper preparation of the transaction; and Article 6(1)(c) GDPR where processing is required by law.

3.3 Compliance with legal obligations

We process personal data where necessary to comply with obligations arising in particular from accounting, tax, consumer protection, archiving and other generally binding legislation.

Legal basis: Article 6(1)(c) GDPR.

3.4 Obligations under AML legislation

Where Act No. 297/2008 Coll. on Protection against Money Laundering and Terrorist Financing, as amended, applies to a particular transaction, we process the data necessary to identify and verify the client, determine the ultimate beneficial owner, assess the purpose and nature of the business relationship and comply with other customer due diligence obligations. In the case of brokerage relating to the purchase or sale of real estate, these obligations apply in accordance with the law; in the case of rental brokerage, the status of an obliged entity is linked to a monthly rent of at least EUR 10,000.

Legal basis: Article 6(1)(c) GDPR.

3.5 Accounting, invoicing and payment records

We process data necessary to issue and record accounting and tax documents, record payments and comply with accounting and tax obligations.

Legal basis: Article 6(1)(c) GDPR.

3.6 Protection of rights and legal claims

To the extent necessary, we process data to establish, exercise or defend our legal claims, resolve disputes and complaints, and protect our property.

Legal basis: Article 6(1)(f) GDPR – our legitimate interest in protecting and exercising our rights.

3.7 Communication and handling enquiries

If you contact us without an existing contractual relationship, we process the data necessary to deal with your enquiry and maintain records of the related communication.

Legal basis: Article 6(1)(b) GDPR where the communication is directed towards entering into a contract, or Article 6(1)(f) GDPR in the case of general communication.

3.8 Operation, security and electronic signing

We process technical and security data to ensure the functionality and protection of information systems, prevent and resolve security incidents, and demonstrate the course of electronic signing, approval or delivery of documents.

Legal basis: Article 6(1)(f) GDPR – our legitimate interest in secure operation and demonstrating that actions have taken place; and, in the case of actions necessary to enter into or perform a contract, also Article 6(1)(b) GDPR.

3.9 Direct marketing

We send property offers and other marketing communications only where we have a valid legal basis and the method of contact is permitted by Act No. 452/2021 Coll. on Electronic Communications, as amended. Where processing is based on consent, you may withdraw your consent at any time. We may send existing clients offers concerning our own similar services only to the extent permitted by the statutory exception; each communication will provide a simple and free method of opting out.

Legal basis: Article 6(1)(a) GDPR – consent; or Article 6(1)(f) GDPR – our legitimate interest in promoting our own similar services to existing clients, provided that the statutory conditions are met. You have the right to object to direct marketing at any time.

4. Legitimate interests

Where processing is based on Article 6(1)(f) GDPR, our legitimate interests include, in particular, the proper and secure preparation of real estate transactions, the protection and establishment of legal claims, the security of information systems, maintaining records of communications, demonstrating electronic actions and, to the extent permitted by law, promoting our own similar services to existing clients. Before relying on this legal basis, we assess whether the processing is necessary and whether the data subject's rights and freedoms override our interests. You may object to such processing.

5. Sources of personal data

We obtain personal data primarily directly from you. In connection with a real estate transaction, we may also obtain it:

- **from contracting parties** – from the property owner, a prospective buyer or tenant, the other contracting party or their representatives;
- **from public sources** – in particular from the Real Estate Cadastre, Commercial Register, Trade Register and other public registers maintained under the law;
- **from persons involved in the transaction** – from lawyers, notaries, banks, residential building managers, experts and cooperating real estate agencies;
- **from a legal entity** – on whose behalf you act or for which you are a contact person, representative or ultimate beneficial owner.

If we do not obtain the data directly from you, we will provide the information required under Article 14 GDPR within the statutory time limit: no later than one month after obtaining the data, at the time of our first communication with you, or no later than the time when the data is first disclosed to another recipient, whichever occurs first. Exceptions apply only to the extent permitted by the GDPR.

6. Recipients of personal data

We provide or make data available only to the extent necessary and according to the nature of the particular service or transaction. Recipients may include in particular:

- **professional advisers** – lawyers, notaries, experts, surveyors, tax advisers, auditors and other professional advisers;
- **financial and transaction-related entities** – banks and financial service providers involved in financing or settling the transaction;
- **public authorities** – district offices (cadastral departments), courts, law enforcement authorities, the Financial Intelligence Unit and other authorities where required by law;
- **entities connected with the property** – residential building managers, owners' associations and service providers connected with the property;
- **cooperating entities** – other real estate agencies and the other contracting party, including its representatives, where necessary to complete the transaction;
- **processors** – accountants and providers of IT, hosting, cloud, e-mail, CRM, backup, administrative and electronic signing services that process data on our instructions and on the basis of a contract.

We do not provide personal data to third parties for their own marketing purposes without a separate legal basis.

7. Transfers outside the European Union and the European Economic Area

When using certain IT, cloud, communication or electronic signing services, personal data may be processed outside the EU/EEA, depending on the particular provider, especially in the United States of America. Any such transfer will take place only in accordance with Chapter V of the GDPR, in particular on the basis of a European Commission adequacy decision, including the EU-US Data Privacy Framework where it applies to the relevant recipient, or on the basis of standard contractual clauses and, where necessary, supplementary measures. Information about the specific country, recipient and transfer mechanism used, including the possibility of obtaining a copy of the safeguards, will be provided upon request.

8. Retention periods

We retain personal data only for as long as necessary for the relevant purpose. In standard cases, we apply in particular the following retention periods:

- **enquiries and pre-contractual communications not resulting in a contract** – 12 months from the last substantive communication, unless another legal basis for longer retention arises;
- **contractual and transaction documentation** – for the duration of the contractual relationship and generally for five years after its termination or complete settlement; where a dispute or claim is pending, until its final resolution and the expiry of the period for enforcement of the decision;
- **accounting and tax documents** – for ten years following the year to which they relate, or for a longer period where required by specific legislation;
- **AML documentation** – for five years from the end of the business relationship or completion of an occasional transaction; upon instruction from the competent authority, this period may be extended by no more than a further five years;
- **marketing based on consent** – until consent is withdrawn, but no longer than three years from the date on which it was given or from the last demonstrable active interaction, unless the consent has been renewed;
- **marketing to existing clients** – until an objection is raised or the client opts out, but no longer than three years from the end of the business relationship;
- **security logs** – generally for no longer than 12 months; in the event of a security incident, until the incident has been fully resolved and any related claims have been settled;
- **records of electronic signatures or approvals** – generally for five years from the relevant transaction, or longer where they form part of documentation retained under the law or for the protection of legal claims.

After the relevant period expires, we will delete or anonymise the data unless its continued retention is required by law or is necessary for the establishment, exercise or defence of legal claims.

9. Requirement to provide personal data

The provision of certain personal data is a legal or contractual requirement. If you do not provide this data, we may be unable to verify your identity, enter into or perform a contract, complete a real estate transaction or comply with a legal obligation. You are not required to provide data requested solely for consent-based marketing purposes; failure to provide such data will not affect the provision of real estate services.

10. Automated decision-making and profiling

When providing real estate services, we do not carry out decision-making based solely on automated processing, including profiling, which would produce legal effects concerning you or similarly significantly affect you within the meaning of Article 22 GDPR.

11. Your rights as a data subject

Subject to the conditions laid down in the GDPR, you have in particular the following rights:

- **right of access** – to obtain confirmation as to whether we process your data and access to that data under Article 15 GDPR;
- **right to rectification** – to request the correction of inaccurate data or completion of incomplete data under Article 16 GDPR;
- **right to erasure** – to request erasure where the conditions of Article 17 GDPR are met;
- **right to restriction of processing** – to request restriction under Article 18 GDPR;
- **right to data portability** – to receive and transmit data under Article 20 GDPR where the processing is automated and based on consent or a contract;
- **right to object** – to object to processing based on legitimate interests under Article 21 GDPR; you may object to direct marketing at any time, in which case we will cease processing your data for that purpose;
- **right to withdraw consent** – to withdraw consent at any time without affecting the lawfulness of processing carried out before its withdrawal;
- **right to lodge a complaint** – to lodge a complaint with the supervisory authority under Article 77 GDPR.

12. How to exercise your rights

You may exercise your rights by e-mail at axisreal@axisreal.sk or in writing at Axis real, spol. s r.o., Bosákova 5/A, 851 04 Bratislava. In your request, please state which right you wish to exercise and what you are requesting.

We will respond to your request without undue delay and no later than one month after receiving it. Depending on the complexity and number of requests, this period may be extended by no more than two additional months; we will inform you of any extension and the reasons for it within one month. If we have reasonable doubts concerning your identity, we may request reasonable additional information necessary to verify it. Exercising your rights is free of charge; in the case of manifestly unfounded or excessive requests, in particular repeated requests, we may charge a reasonable fee or refuse to act to the extent permitted by the GDPR.

13. Complaint to the supervisory authority

If you believe that the processing of your personal data has infringed your rights, you may lodge a complaint or submit a request to initiate proceedings with the supervisory authority:

Office for Personal Data Protection of the Slovak Republic

Galvaniho Business Centrum II
Galvaniho 7/B, 821 04 Bratislava
E-mail: statny.dozor@pdp.gov.sk
Website: www.dataprotection.gov.sk

14. Security of personal data

We implement appropriate technical and organisational measures corresponding to the nature of the processing and the risks involved, including, in particular, access-rights management, protection of devices and accounts, backups, updates, training of authorised persons and contractual safeguards for processors. We regularly review and appropriately update these measures.

15. Electronic communication and electronic signing

When documents are concluded or approved electronically, we may process timestamps, transaction identifiers, e-mail addresses, telephone numbers, IP addresses and other technical records necessary to secure and demonstrate the course of the action. The scope of the data depends on the service used and the method of verification.

16. Cookies

We use essential cookies on our website that are necessary for its operation and security. We use analytics, preference or marketing cookies only with prior consent where required by law. Consent may be changed or withdrawn at any time through the cookie settings; refusing consent must not prevent the use of the website's basic functions. Details of the specific cookies, their providers and retention periods are set out in the separate cookie information available on the website.

17. Changes to this information

We may update this information as appropriate, in particular following changes to processing activities, services used or applicable legislation.

This document is effective from **18 August 2026**.