

These Rules of personal data protection (hereinafter referred to as the "Rules") will provide you with all the necessary information on how and why we handle your personal data, how you can contact us if necessary, what are your rights in relation to the processing of your personal data. The Rules govern the details, scope, purpose, legal basis and method of protection in the processing of your personal data, as well as the persons whose personal data we process in connection with your booking and accommodation in the City Castle Apartments (hereinafter we will refer to you together with other accommodated persons as "Affected Persons").

Processing principles of your personal data

The company 2R Invest s.r.o while processing personal data respects the following six basic principles of personal data processing and is responsible for the compliance of personal data processing with these principles. The principles of personal data processing are:

- I. the principle of legality, fairness and transparency – personal data are processed lawfully, equitably and transparently in relation to the Affected Person;*
- II. the principle of purpose limitation – personal data are collected for specifically designed, explicitly stated and legitimate purposes and are not further processed in a way incompatible with those purposes, further processing for purposes of archiving in the public interest is not considered incompatible with the original purposes;*
- III. the principle of data minimization – personal data are adequate, relevant and limited to the extent necessary for the purposes for which they are processed;*
- IV. the principle of accuracy – personal data are correct and, at need, updated and we have applied all necessary measures to ensure that personal data which are incorrect in terms of the purposes for which they are processed are erased or corrected without delay;*
- V. the principle of minimizing retention – personal data are kept in a form which allows the identification of the data subjects for as long as it is necessary for the purposes for which the personal data are processed;*
- VI. the principle of integrity and confidentiality – personal data are processed in a way that guarantees reasonable security of personal data, including protection against unauthorized or illegal processing and accidental loss, destruction or damage, through reasonable technical or organizational measures.*

1 Introductory provisions

- 1.1 While processing personal data, we follow the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with connection to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (hereinafter referred to as the "General Data Protection Regulation"), Act no. 18/2018 Coll. on the Protection of Personal Data and on the Amendment of Certain Acts (hereinafter referred to as the "Personal Data Protection Act") Personal Data Protection Act:
 - 1.1.1 of Act no. 22/2004 Coll. on electronic commerce and on the amendment of Act no. 128/2002 Coll. on state control of the internal market in matters of consumer protection and on the amendment of certain laws as amended by Act no. 284/2002 Coll.,
 - 1.1.2 of Act no. 351/2011 Coll. on electronic communications, as amended,
 - 1.1.3 of Act no. 513/1991 Coll. Commercial Code as amended,
 - 1.1.4 of Act no. 40/1964 Coll. Civil Code as amended,
 - 1.1.5 of Act no. 102/2014 Coll. on consumer protection while selling goods or providing services on the basis of a contract concluded at a distance or a contract concluded outside the premises of the seller and on the amendment of certain laws,
 - 1.1.6 of Act no. 250/2007 Coll. on consumer protection and on the amendment of the Act of the Slovak National Council no. 372/1990 Coll. on offences as amended.

1.2 **The Operative** while processing of personal data in accordance with § 5 letter o) of the *Personal Data Protection Act* is a person, who defines the purpose and means of personal data processing and who processes personal data in their own name. The operative is, in accordance with the above mentioned, the company 2R Invest s.r.o., with its registered office at Zochova 4, 811 03 Bratislava, company registration number: 43 842 526, registered in the Commercial Register of the District Court Bratislava I, section Sro, file no. 49298/B (hereinafter referred to as the "*Operative*" or just "*Company 2R Invest s.r.o.*" or only "*Company*"), as it is a person who provides you booking and accommodation services and defines the purpose and means of personal data processing.

1.3 We process your personal data to the necessary extent, while most of the processing actions are reasoned by the fact that this personal data is necessary to provide the required services, is related to the provision of our services, their processing is necessary to fulfil legal requirements of the Operative or we rely on legitimate interest while processing in question.

The purpose and legal basis for the processing of your personal data is based on Article 6(1)(b)(c) and (f) of the General Data Protection Regulation, namely:

1.3.1 *booking and provision of accommodation and services related to it.*

We process your personal data mainly for the purpose of fulfilling the pre-contractual obligations and contractual obligations related to concluding an accommodation contract, processing your booking and providing accommodation services according to the concluded accommodation contract and according to the terms related to accommodation services. This involves guest registration, customer services and communication with you. The legal basis for the processing of your data is the preparation of the contract, the conclusion of the contract and the contract fulfilment, on the basis of which accommodation services will be provided to the Affected Person by the company 2R Invest s.r.o. The data is kept for a period of 10 years following the year of concluding the contract, i. e. from the day of ordering the accommodation, or concluding the accommodation contract.

1.3.2 *fulfilment of legal obligations, i. e. managing a guest book.*

We maintain the guest book:

- a) pursuant to § 24 par. 1 of Act no. 253/1998 Coll. On reporting of the residence registration of the Slovak Republic citizens and the register of the Slovak Republic inhabitants (data in the range: name and surname of accommodated person and accompanying children, ID card number or travel document of accommodated person and accompanying children (if the identity card or passport is issued), address of permanent residence and period of accommodation of accommodated person and accompanying children, e-mail and telephone contact),
- b) in accordance with Act no. 404/2011 on the stay of foreigners, which imposes the Operative the obligation to verify the identity of a foreigner while being accommodated. Under this act arise obligations such as the need to register to the guest book and fill in the official form for reporting the foreigners' stay (data in the range of name and surname, date and place of birth (state), nationality, permanent residence in the home state, travel document number, type , number and visa validity and the names and surnames of the accompanying children).

The legal basis for the personal data processing for this purpose is the fulfilment of the legal obligations of the Operative. The retention period is 10 years following the year in which the accommodation services were provided to you.

1.3.3 *exercising of our legal claims.*

In some cases, we are forced to apply to court to exercise our rights and by law protected interests or we are forced to participate in judicial or administrative proceeding to protect our rights and by law protected interests. The legal basis for the personal data processing for this purpose is the legitimate interest of the Operative. The retention period of personal data for this purpose of processing is 10 years from the final decision of the court or other public authority.

1.3.4 *marketing of our Company.*

Marketing is performed in the form of sending information about us or useful information related to the services we provide in the event of a previous contractual relationship with you. Our Company has a legitimate interest to contact you and send you commercial offers and information about the services provided, via your e-mail address. The legal basis for the personal data processing for this purpose is the legitimate interest of our Company. The retention period of data for this purpose is 5 years from the date of the last use of accommodation services.

1.3.5 *keeping an accounting administration.*

Our company, as any other business entity, is subject to tax and accounting obligations arising from legal regulations. In order to fulfil our legal obligations we process your personal data. The legal basis for the personal data processing for this purpose is the fulfilment of the legal obligations of the company

2R Invest s.r.o. The retention period is 10 years following the year to which relate the payments associated with the exact user.

1.3.6 *processing your requests as an Affected Person.*

In order to respond and process your request by which you exercise your legal rights as an Affected Person, it is necessary to identify yourself. After that we process your personal data included in the request for the purpose of proper request processing. The legal basis for the personal data processing for this purpose is the legitimate interest of the Operative. We keep the request of the person concerned for a period of 5 years following the year in which the request was processed.

1.3.7 *handling of complaints, reclamations and other incentives.*

You can invoke complaints or reclamations according to the concluded accommodation contract and according to the general terms and conditions, which include also the Complaints Policy. In case of a complaint, we need your identification and contact data. After that we process the personal data contained in the complaints, reclamations and other incentives for the purpose of proper processing. The legal basis for the personal data processing for this purpose is the legitimate interest of the Operative. We keep documents related to complaints or other incentives and reclamations for a period of 10 years following the year of termination in which the complaints, reclamations and other incentives were dealt with.

1.3.8 *improving the services provided by us.*

We get information obtained while using our website www.citycastle.sk, such as your IP address, the type of browser used and your language settings, based on a legitimate interest, which is the improvement and efficient operation of the website. Tool Google Analytics is used to measure audience.

1.3.9 *simplification of further online transactions by remembering payment data.*

In the event that you voluntarily decide as the Affected Person, you can give us, as the Operative, consent to remember your payment card data. It is up to your decision if to use the functionality to simplify further online transactions. The consent is valid for the period of using this functionality.

1.3.10 *ensuring your safety.*

All common areas – corridors, elevator, garages are scanned by the operator's camera system. The personal data processed by the camera system is processed exclusively for the purposes of the legitimate interests of the Accommodation Provider, which is the protection of the Accommodation Provider's property and data subjects and the safety of the data subjects during their stay in the apartments. The data thus obtained shall be archived for 7 days, after which they shall be automatically deleted. In the form of a video recording shall be provided to law enforcement authorities or other authorised bodies on request State authorities (e.g. a court).

1.4 The provision of personal data is voluntary. However, we can provide you our services only in the case if we have the necessary personal data. The consequence of not providing personal data is the impossibility to book an accommodation and the impossibility to provide accommodation services. If the required data is not provided, we cannot book accommodation for you. We process your personal data to the necessary scope, while most of processing actions are justified by the fact that this personal data is necessary to provide the required services, is related to the provision of our services, their processing is necessary to fulfil legal requirements of the Operative or it is legitimate interest in the given processing.

1.5 If we process your personal data on the basis of a legitimate interest, we take such actions to ensure that the impact on your privacy is limited to minimum and that the processing does not disrupt the balance between our legitimate interests and your privacy.

1.6 The Responsible Person is the person authorized to protect personal data processed by the company 2R Invest s.r.o. and to answer any questions you may have regarding your personal data processing. You can contact the Responsible Person via following contact data: jan@tuteraz.sk, +421 905 234 456. In the case of a written request sent to the registered office of the company 2R Invest s.r.o., Zochova 4, 811 03 Bratislava, please, state the note "*GDPR – Responsible Person*" on the envelope.

2 Scope of personal data processed

2.1 The company 2R Invest s.r.o. processes only such personal data on the basis of which we can provide you with reservation and accommodation services with professional care while fulfilling your legal obligations, while the scope of your personal data is determined according to the purposes of personal data processing according to point 1.3 above.

2.2 The company 2R Invest s.r.o. processes your personal data by automated and non-automated means of processing. Automated processing of personal data is carried out through dedicated secure devices.

2.3 The company 2R Invest s.r.o. states that only expressly authorized and instructed persons have access to your personal data and at the same time we ensure the protection of personal data against damage, destruction, loss,

change, unauthorized access and disclosure, provision or disclosure and against any other unacceptable processing methods. In connection to such security, appropriate technical and organizational measures were taken corresponding to the way personal data are processed.

- 2.4 In the event if the legal basis for the personal data processing is a contract, the provision of personal data is a contractual requirement. The Affected Person is obliged to provide personal data; in the absence of such information, it is not possible to enter into a contractual relationship.
- 2.5 In the event if the legal basis for the personal data processing is the law, the provision of personal data is a legal requirement. The Affected Person is obliged to provide personal data, otherwise it is not possible to properly fulfil the Operative's obligations arising from the relevant generally binding legal regulations.
- 2.6 In the event if the legal basis for the personal data processing is a legitimate interest pursued by the Operative or a third party, the purpose of the processing is to determine the legitimate interest.
- 2.7 The personal data that we process for the purpose to book accommodation according to the point 1.3.1 of these Rules and for the purpose of processing request as an Affected Person according to the point 1.3.6 of these Rules are identification and contact data to the following scope: title, name and surname, contact telephone number, e-mail address and bank account, or transaction data, which means data on received and sent payments.
- 2.8 Personal data we process for the purposes of
- a) concluding an accommodation contract according to the point 1.3.1 of these Rules,
 - b) fulfillment of legal obligations according to the point 1.3.2 of these Rules,
 - c) applying legal claims according to the point 1.3.3 of these Rules,
 - d) keeping an accounting administration according to the point 1.3.5 of these Rules,
 - e) handling of complaints, reclamations and other incentives according to the point 1.3.7 of these Rules,
- are identification and contact data in the following scope:
- 2.8.1 address of permanent stay, type and number of identity card, payment card data in case of payment by credit card, other data connected to your accommodation such as arrival and departure date, communication related to your accommodation, provision of evaluation, transaction data which means data of payments received and sent,
- 2.8.2 in the case of foreigners, name, surname, date and place of birth of the foreigner, nationality, permanent stay in the home state, purpose of the travel to the Slovak republic, passport number, visa: type, number, validity, name and address of the accommodation facility in the Slovak republic, co-travelling children, length of stay in the Slovak republic, payment card data in case of payment by credit card, other data related to your accommodation such as the day of arrival and departure, communication related to your accommodation, provision of evaluation, transaction data which means data on received and sent payments.

We are aware that sometimes you book accommodation also for other people. In this case, you will sometimes provide us the personal data of other people within the scope of your booking. We must notice you that it is your responsibility to inform the persons whose data you share that you do so and to ensure that they understand and agree with the method we process their personal data and provide them the data involved in this statement.

- 2.9 Personal data that we process for marketing purposes according to the point 1.3.4 of these Rules and for the purpose of improving our services according to the point 1.3.8 of these Rules are data from communication, which means especially data from the usage of our website, data from our mutual commercial communication or contact data through the appropriate contact points, including your requests, complaints or other forms of demands. Other acquired data may be information about your interaction with us, such as what place you visited our website and how long you used it, response times, download errors, technical data of the devices used and settings, such as IP address, browser settings, operating system, platform, cookies etc.
- 2.10 Personal data that we process for the purposes of processing request as an Affected Person according to the point 1.3.6 of these Rules are identification and contact data in the following scope: title, name and surname, contact telephone number, e-mail address or address of permanent stay, if you request the handling of your request by sending a document to the address of your permanent stay. Other personal data that we process within the meaning of 1.3.10 of this Policy is your likeness recorded by the camera system.2.11 In most cases, you as an Affected Person are the source of personal data in principle. While using our services, you are obliged to comply with these Rules, so if we disclose information about someone other than you through our platforms, we rely on the consent of the Affected Person.

3 Cookies

- 3.1 Personal data that we process for marketing purposes according to the point 1.3.4 of these Rules and for the purpose of improving our services according to the point 1.3.8 of these Rules are also cookies.
- 3.2 We use cookies in order to provide better services for visitors to the websites and portals of the company 2R Invest s.r.o. – www.citycastle.sk. These are small text files stored on your device which can be sent to you as a web visitor when you visit our websites and portals and they are stored in the file folder of your web browser.

The next time you visit the website www.citycastle.sk or the relevant portal, the internet browser loads again the cookies and sends this information back to the website which created the cookies. Cookies allow websites to detect your device and remember certain information about you as a visitor to our website and about your activities done while visiting our website. By obtaining information about you and your actions, we can continuously find out your interests and offer you, for example, a suitable service or statistically evaluate your behaviour.

3.3 The company 2R Invest s.r.o. uses temporary and permanent cookies on its website and portals. Temporary cookies are stored on your device until you leave the website www.citycastle.sk or the relevant portal. On the other hand, persistent cookies remain on your device until they expire or until you delete them manually. While visiting the website www.citycastle.sk and its appropriate portals, you express your consent to the use of cookies, but you also have control elements available to block or delete them.

3.4 The use of cookies when visiting our websites and portals is at your decision while most internet browsers are pre-configured to accept cookies automatically. If you want to manage your cookies preferences, you can change the settings of cookies in your internet browser at any time. You can allow all cookies or only some of them. If you disallow our cookies in your browser settings, some parts of our website will not work properly for you, i. e. the result may be a restriction or exclusion of certain features of our website and a reduction in your comfort while visiting our websites and portals.

4 Automatized individual decision taking, including profiling

4.1 The company 2R Invest s.r.o. processes the personal data of the Affected Person also by automatized means of processing. However, the result is not a decision which would have legal effects on you as the Affected Person or which would similarly significantly affect them. Personal data will not be used for automatized individual decision-taking, including profiling according to the Art. 22 of the General Data Protection Regulation.

5 Your personal data protection

5.1 Your personal data is processed by automatized and non-automatized means of processing within our information systems, which are protected and secured according to the relevant security standards described below.

5.2 To ensure the necessary level of personal data security against their loss, destruction, unauthorized access, change, unauthorized disclosure or misuse, the company 2R Invest s.r.o. takes necessary technical and organizational measures and ensures security technologies and procedures. One of the measures is the storage of your personal data in databases/software, to which only the company's managers and contractually authorized persons have access (Ján Šimák, jan@tuteraz.sk, +421 905 234 456, hereinafter also referred to as "*Authorized Persons*"), who were properly acquainted with the procedures for your personal data protection by the Operative and were informed of the possible consequences of breaking these instructions.

5.3 We regularly check the access of the authorized persons scope listed here to your personal data, we use firewalls, anti-virus programs, we provide regular changes of access passwords, we use secure servers (located in the EU, as well as backup servers; access is limited to authorized users and the company providing web hotel and booking services according to the point 6.3.2 of these Rules fulfil the international security standards PCI and PII for protection, storage, encryption of sensitive data; personal data in the database are encrypted). All electronic devices on which your personal data is situated are secured by passwords and biometric data of Authorized Persons. For the purpose of maximum protection, the encryption of personal data and access passwording to the Operative's internal systems are used. Organizational arrangements create a set of Code of conduct for Authorized Persons, which is incorporated into contracts concluded with Authorized Persons; however, they are confidential due to their commercial nature.

5.4 We follow the principle of minimizing personal data and process only such personal data that is necessary to reach the purpose of the processing. Personal data is processed for pre-defined purposes and is not processed for any other purpose, while we continuously evaluate if the processing of personal data would create a high risk to the Affected Persons and interfere with their privacy in an inappropriate manner. According to this observation, a detailed assessment of the risks and impact on the privacy of the Affected Persons is done, whose result is taken into account while setting up and realizing the Operative's procedures.

6 Receivers of your personal data

6.1 In extraordinary situations, your personal data may be provided to third parties, in particular if such a procedure is permitted by appropriate law.

6.2 Some processing actions are also done by our suppliers and contractual partners. While selecting suppliers, we pay particular attention to their professional, technical, organizational and personal skills so that the processed personal data security is guaranteed.

- 6.3 To our suppliers and business partners belong especially, but not limited to:
- 6.3.1 web and hosting service provider, servers, data backup and storage: Amenit s.r.o., with its registered office at Žerotínova 2083/11, 741 01 Nový Jičín, Czech Republic, company registration number: 25 816 888,
 - 6.3.2 provider of the web hotel and booking system on the main domain www.citycastle.sk: HORECA GROUP s.r.o., with its registered office at 20/B, 058 01 Poprad, company registration number: 47 912 618,
 - 6.3.3 providers of accounting, auditing and legal services: NUMERA, s. r. o. (accounting services), Mgr. Zuzana Gavorová, lawyer, JUDr. Ľubomír Schweighofer, lawyer, JUDr. Soňa Tóthová (legal services).
 - 6.3.4 providers of system support and programming services: Amenit s.r.o., with its registered office at Žerotínova 2083/11, 741 01 Nový Jičín, Czech Republic, company registration number: 25 816 888,
 - 6.3.5 provider of payment services:
 - 6.3.6 business partner tu&teraz s. r. o., with its registered office at Pastuchov 117, Pastuchov 920 63, company registration number 53 161 050 is our contractually authorized provider according to the Art. 28 of the General Data Protection Regulation, who comes into contact with your personal data when providing accommodation services, managing bookings and communication with guests and provides accounting, business and administrative support,
 - 6.3.7. Effective Hotel Management s. r. o. with its registered office at Ďurgalova 7541/7, 831 01 Bratislava, company registration number 53 045 882, as provider in the field of sales and revenue optimization, revenue management and its management in the hotel and reservation system.
- 6.4 Connected to the control or supervision performance, your personal data may be provided to authorities that legally control the performance of our activities, e. g. Office for Personal Data Protection of the Slovak Republic, Slovak Trade Inspection, relevant tax administrators and others. Based on individual legal regulations, we provide personal data to certain entities to who we are obliged to provide this data on the basis of their request for collaboration, e.g. state administration bodies, courts, prosecutor's offices, bodies active in criminal proceedings or the Financial Administration of the Slovak Republic.
- 6.5 Connected to the enforcement of our rights and legally protected interests, in justified cases, we provide your personal data to relevant courts, executors, notaries, law firms, forensic experts, or other external entities that deal with the enforcement or application of rights.

7 Retention period of your personal data

- 7.1 We store and protect your personal data for the period defined by applicable legal provisions. If we store your personal data with your consent, we store personal data for the period for which you have given your consent to us. Retention periods for personal data vary depending on the specific purpose for which the personal data are processed and their duration is defined in point 1.3 of these Rules. The specified retention period for personal data is based on the principle of minimizing the retention of personal data.
- 7.2 In some cases, you provide us your personal data at the moment of accommodation by filling in specific data in the form, which is situated in your apartment at the beginning of the accommodation, to the scope defined in point 1.3.2 of these Rules. We will handle this form from you personally and provide the data from it to the adequate state authorities according to the point 1.3.2 of these Rules to fulfil our legal obligations. Consequently, the forms are stored in the company's archive and to which only the companies 2R Invest s.r.o. and the company tu&teraz s. r. o. have access. The legal basis and retention period in this case is the same as the legal basis and retention period defined in point 1.3.2 of these Rules. However, the collection and retention of personal data in this case is in paper form.

8 Your rights (rights of the Affected Person)

- 8.1 As an Affected Person, you have the following rights:
- 8.1.1 *The right to access data according to the Art. 15 of the General Data Protection Regulation:*
You have the right to get information from us on if we process your personal data. In the case, if we process your personal data, you have the right to access this personal data to the extent of: the purpose of the processing, the category of personal data, the receivers of the personal data, the processing time of the personal data and information about the source from which we got your personal data. You also have the right to get a copy of your personal data, but you must explicitly state it in your request. If you request additional copies, we have the right to charge an adequate fee for that service for making additional copies. Rights of third parties, including other persons, which the company 2R Invest s.r.o. provided personal data. However, they cannot be restricted by this and the company 2R Invest s.r.o. cannot make third-party personal data available to you in this way.

8.1.2 *The right to correct or completion according to the Art. 16 of the General Data Protection Regulation:*
You have the right to request the correction of incorrect personal data or completion of incomplete personal data which we process about you. By using this right, you can help to keep your personal data correct and actual.

8.1.3 *The right to deletion (the right to "forget") according to the Art. 17 of the General Data Protection Regulation:*

You have the right to request that your personal data be deleted without undue delay if any of the following reasons are fulfilled:

- a) personal data are no more needed for the purposes for which they were got or otherwise processed,
- b) the Affected Person withdraws the consent according to the Article 6, par. 1 letter (a) of the General Data Protection Regulation or withdraw the express consent pursuant to Article 9, par. 2 letter (a) of the General Data Protection Regulation, and there is no other legal basis for processing,
- c) the Affected Person objects to the processing provided for in the Article 21 par. 1 of the General Data Protection Regulation (objection to a legitimate or public interest) if there are no legitimate reasons for processing or the Affected Person objects to processing under Article 21 par. 2 of the General Data Protection Regulation (objection to direct marketing),
- d) personal data have been processed illegally,
- e) personal data must be deleted to comply a legal obligation under Union law or the law of the Member State to which the company 2R Invest s.r.o. subjects to,
- f) personal data has been collected in connection with the offer of information company services according to the Article 8 par. 1 of the General Data Protection Regulation (child consent).

The company 2R Invest s.r.o. has no obligation to delete your personal data in the case of processing:

- a) to apply the right to freedom of expression and information,
- b) to comply a legal obligation requiring processing under Union law or the law of the Member State to which the company 2R Invest s.r.o. subject to, or to fulfil a task carried out in the public interest or in the performance of official authority entrusted to the company,
- c) for reasons of public interest in the area of public health according to the Article 9 par. 2 letter (h) and (i) as well as Article 9 par. 3 of the General Data Protection Regulation,
- d) for archiving purposes in the public interest, for scientific or historical research purposes or for statistical purposes pursuant to Article 89 par. 1 of the General Data Protection Regulation, if the law referred to in paragraph 1 is likely to make it impossible or seriously difficult to achieve the objectives of such processing, or
- e) to establish, apply or defend legal claims.

8.1.4 *The right to restrict processing according to the Art. 18 of the General Data Protection Regulation:*
You have the right to request the blocking of your personal data (restriction of the processing of your personal data to their storage; other processing operations during the blocking are not allowed) in the following cases:

- a) restriction on the processing of your personal data at the time of their accuracy verification,
- b) if your personal data is processed illegally and at the same time you require, instead of deleting your personal data, only a restriction of their processing (only storage),
- c) you need your personal data to prove, apply or defend legal claims,
- d) you objected to the processing according to the Article 21 par. 1 of the General Data Protection Regulation (legitimate interest or public interest), until the verification of if legitimate reasons on the part of the company 2R Invest s.r.o. predominate your legitimate interests.

In the event of a restriction of the personal data processing, the company 2R Invest s.r.o. may only store or process personal data:

- a) for the purpose of proving, applying or defending legal claims,
- b) for the protection of the rights of another natural or legal person,
- c) for reasons of important public interest of the Union or a Member State,
- d) with the consent of the Affected Person.

If a situation arisen which would lead to the cancellation of the restriction on the processing of personal data, the company 2R Invest s.r.o. shall inform the Affected Person in advance.

8.1.5 *The right to data portability according to the Art. 20 of the General Data Protection Regulation:*
You have the right to get your personal data that you have provided to us in a structured, commonly used and machine-readable format. You have the right to request us to transfer your personal data from the company 2R Invest s.r.o. to another Operative who you define in your request, provided that it is technically possible. The right to the transfer of personal data applies in cases if:

- a) the processing is based on a legal basis of consent or contract,
- b) the processing is performed by automatized means.

8.1.6 *The right to object according to the Art. 21 of the General Data Protection Regulation:*

You have the right to object at any time to the processing of your personal data if the legal basis for the processing of personal data is a legitimate interest within the meaning of Article 6 par. 1 letter f) of the General Data Protection Regulation, by sending a written request to the email address jan@tuteraz.sk, by post or by personal handing in a written request at the registered office of the company 2R Invest s.r.o. We will destroy your personal information upon receipt of the dispute, except in the following cases:

- a) if the company 2R Invest s.r.o. proves the necessary legitimate reasons for the processing which predominate your interests, rights and freedoms, or
- b) if it is proven that the company 2R Invest s.r.o. needs your personal data to prove, apply or defend legal claims;

Your objections do not affect your personal data processing before your objections are received.

8.1.7 *Automatized individual decision-taking, including profiling according to the Art. 22 of the General Data Protection Regulation:*

You have the right not to be subject to a decision which is based solely on automatized processing, including profiling, and which has legal effects related to you or affecting you in a similar way. That right shall not apply if the decision is:

- a) necessary to conclude or perform the contract between the Affected Person and the company 2R Invest s.r.o.
- b) permitted by Union law or by the law of a Member State to which the company 2R Invest s.r.o. subjects to and at the same time lay down appropriate measures guaranteeing the protection of the rights and freedoms and legitimate interests of the Affected Person; (c) based on the express consent of the Affected Person.

The provision of our services does not involve automatized individual decision-taking according to the general data protection regulation (Article 4 of these Rules).

8.1.8 *The right to submit a complaint to the regulatory authorities according to the Art. 77 of the General Data Protection Regulation:*

If you believe that your rights to personal data have been violated or that your data has been processed, you have the right to complain to the regulatory authority, which is:

Office for Personal Data Protection of the Slovak Republic
Hraničná 4826/12
820 07 Bratislava 27
phone number: +421 2 3231 3214
e-mail: statny.dozor@pdp.gov.sk

8.1.9 *Applying your rights according to the Art. 12 of the General Data Protection Regulation*

The company 2R Invest s.r.o. provides information related to the personal data processing only at the request of the Affected Person in the performance of their rights, provided that the Affected Person is demonstrably able to identify them. Without successful verification of your identity, the company 2R Invest s.r.o. is not obliged to provide any information related to the personal data processing. In this way the company 2R Invest s.r.o. prevents unauthorized access to your personal data and infringement of your rights by an unauthorized person.

8.2 You can apply your personal data rights in the following ways:

8.2.1 personally at the registered office of the company 2R Invest s.r.o. at Zochova 4 in Bratislava,

8.2.2 by post, by letter sent to the registered office of the company 2R Invest s.r.o.: Zochova 4, 811 03 Bratislava,

8.2.3 by email sent to jan@tuteraz.sk.

8.3 The request must contain all the necessary information and attachments necessary to process it and assess your claims related to the personal data processing. If your request is incomplete, we will contact you to complete it.

8.4 In the event that you apply any of your rights as an Affected Person, our cooperating persons will also be notified of this request, namely the managing director of the company tu&teraz s.r.o., Ján Šimák.

9 Final provisions

9.1 The company 2R Invest s.r.o. is entitled to do any update of these Rules, especially connected to changes in the legislation concerning your personal data protection. The actual version will always be available on the website www.citycastle.sk. In the case of an essential change in the personal data protection, in particular the way of

personal data processing, the company 2R Invest s.r.o. it will fulfil its information obligation by visibly publishing a notice before implementing the changes.

9.2 With this rules, we want to assure you that we handle personal data with the utmost care and respect, according to applicable law and using the available level of technical protection. In case of questions related to the personal data protection, which you did not find the answer to in this document, write an e-mail to the address jan@tuteraz.sk.

9.3 **These Rules are valid and effective on the date of their publication on the website of the Operative and have been updated as of 29/11/2022..**