

## GLOBALWORTH PRIVACY POLICY

### I. INTRODUCTION

This Privacy Policy provides information about the processing of your personal data by Globalworth Group companies, sets out the legal basis for the processing and the ways in which personal data is collected and used, and indicates your rights.

When used in this Policy, the name “Globalworth” and phrases such as “we”, “our”, refer to the relevant Globalworth Group entity that is the controller of your personal data in a particular case.

### II. THE CONTROLLER OF PERSONAL DATA

The controller or the joint controller of your personal data is this Globalworth Group company - in each case based in Warsaw at: 18 Twarda Street, 00 105 Warsaw - with which you enter into a relationship in connection with which your personal data is processed, i.e. the company:

- (a) with whom you interact by correspondence, e-mail or telephone;
- (b) with which you have a business relationship, e.g. you are a party to a contract concluded with the company in question, or you are acting on behalf of and for the benefit of our contractor;
- (c) to whom you apply for a job;
- (d) managing or owning the property you use;
- (e) directing its marketing activities to you – if several Globalworth Group companies direct their marketing activities to you, then they will be joint controllers of your personal data;
- (f) to which you have given your consent to the processing of your image.

You will find a list of our Globalworth Group companies that are controllers or joint controllers of your data in the abovementioned relationships in Section XII below.

Information about the specific controller, the purposes of the processing and your rights are presented to you each time you provide us with your personal data at the latest, or – in the case of obtaining your data from a third party – within the timeframe provided by the provisions of the GDPR.

The relationship between you and the Polish companies belonging to the Globalworth Group and the related purposes of data processing are described in Section V below.

### III. CONTACTING GLOBALWORTH ON MATTERS AND PROCESSING OF PERSONAL DATA

For all matters relating to the processing of personal data, you may contact us by sending mail to the address indicated in Section II above with the notation “ GDPR” or via email at: [rodo@globalworth.pl](mailto:rodo@globalworth.pl).

In the case of GW Tech sp. z o.o., which has appointed a Data Protection Officer, the Officer can be contacted at e mail address: [gwtech.iod@olesinski.com](mailto:gwtech.iod@olesinski.com).

### IV. SOURCE OF DATA AND VOLUNTARINESS OF PROVIDING THEM

Your data has been obtained from their controller, which is our contractor, directly from you or comes from publicly available sources. Provision of data is voluntary, but necessary for cooperation, communication, recruitment, staying in a property managed by us, participation in events and marketing actions organized by us.

### V. PURPOSES AND GROUNDS FOR PROCESSING YOUR PERSONAL DATA

The purposes and bases for processing your personal data vary depending on the type of relationship we have. Below you will find the purposes and bases for processing your personal data depending on that relationship.

#### 1. Communication

When you address correspondence to us (email, snail mail, web forms) that is not related to a contract with us or the services we provide, your personal data contained in that correspondence is processed solely for the purpose of communication and resolution of the matter to which the correspondence relates. In the case of telephone contact, we may request your personal data only if it is necessary to resolve the matter.

The basis for the processing of your personal data is our legitimate interest in conducting correspondence in connection with our business activities – Article 6(1)(f) of the GDPR.

## 2. Business relationships

Within the framework of business relations, we process your personal data in order to take actions related to the conclusion, execution and settlement of the contract between us and you or a contractor with whom you cooperate or whom you represent, including actions taken prior to the conclusion of the contract.

The basis for processing your personal data is:

- (a) performance of a contract to which you are a party – Article 6(1)(b) of the GDPR;
- (b) fulfillment of legal obligations, in particular tax, accounting, anti-money laundering and anti-terrorist financing obligations – Article 6(1)(c) of the GDPR;
- (c) our legitimate interest in fulfilling the contract concluded with you or with a contractor with whom you cooperate or whom you represent, and in handling, investigating and defending against possible claims – Article 6(1)(f) of the GDPR.

## 3. Recruitment

We process the personal data provided by you as part of the ongoing recruitment proceedings in order to consider your candidacy and implement the recruitment process and, if you have provided such consent, for the purposes of future recruitment.

The basis for processing your personal data is:

- (a) fulfilling legal obligations (in particular those arising from the Labor Code, if the preferred form of cooperation is an employment contract) – Article 6(1)(c) of GDPR;
- (b) to take action before entering into a contract to which you will be a party – Article 6(1)(b) of the GDPR;
- (c) your consent if you have expressed a desire to participate in future recruitments, to a greater extent than specified in these regulations or for the purposes of future recruitment processes, as well as in some cases of obtaining data not directly from you – Article 6(1)(a) of the GDPR;
- (d) our legitimate interest in verifying your qualifications and skills and in handling, investigating and defending against possible claims – Article 6(1)(f) of the GDPR.

## 4. Monitoring and use of property

If you reside in or use properties owned or leased by us, we process your personal data for purposes related to ensuring order and security on the property, in particular to maintain an entry and exit book, provide access control and monitor events.

The basis for processing your personal data is our legitimate interest in managing the property, ensuring order and security on the property, and handling, investigating and defending against possible claims – Article 6(1)(f) of GDPR.

## 5. Marketing and organization of events and activities

As part of our marketing activities, we process your personal data as controller or joint controller for the purpose of sending newsletters and notifications, organizing events held on our properties, including registration for these events, and other activities of a similar nature.

The basis for processing your personal data is:

- (a) your consent – Article 6(1)(a) of the GDPR;
- (b) our legitimate interest or that of a third party in ensuring the security and proper handling of the event – Article 6(1)(f) of the GDPR.

## 6. Image processing

If you have voluntarily consented to us processing your image, we will process your personal data for the purpose of showing relations from our activities and events in our marketing communication and in our social media.

The basis for processing your personal data is:

- (a) your consent – Article 6(1)(a) RODO;
- (b) our legitimate interest in conducting marketing communications – Article 6(1)(f) RODO.

## VI. RECIPIENTS OF DATA

Your personal data may be transferred to entities that are part of the Globalworth Group and to entities that cooperate with us, in particular: entities that provide services necessary for the purposes of processing, entities that manage our buildings and their tenants, entities that provide technical and IT, organizational and consulting support, entities authorized by law or that have demonstrated their legitimate interest in accessing the data, entities that provide invoicing, billing, mail and parcel delivery services, security companies and entities that finance us.

## VII. DATA RETENTION PERIOD

We store your personal data, depending on the purposes of the processing (the longest of the periods indicated below determines):

- (a) for the duration of the contract;
- (b) until the expiration of data processing obligations under the law;
- (c) until the expiration of potential claims;
- (d) for the duration of the event or event;
- (e) for the duration of the recruitment, or a period of 1 year from the receipt of the application – in the case of personal data received in connection with recruitment for which consent has been given for participation in future recruitment;
- (f) until you successfully object to the processing of your personal data on the basis of a legitimate interest – ours or that of a third party;
- (g) until you withdraw your consent, where we process your data on the basis of consent.

## VIII. YOUR RIGHTS

You have the following rights related to the processing of your personal data:

- (a) the right to access the content of your data;
- (b) the right to rectify your personal data;
- (c) the right to erasure of personal data or restriction of processing;
- (d) the right to port your data, processed by automated means, when the processing would take place on the basis of your consent or contract, and send it to another controller, if technically possible;
- (e) the right to object to processing carried out on the basis of a legitimate interest - ours or that of a third party;
- (f) the right to withdraw the consent you have given for the processing of data at any time, which does not affect the lawfulness of the processing carried out on the basis of consent before its withdrawal.

## IX. AUTOMATED DECISION-MAKING

In the relationships indicated in Section V above that we have with you, we do not process data based on automated decision-making.

## X. TRANSFER OF DATA OUTSIDE THE EEA

As a general rule, your personal data will be processed within the European Economic Area (EEA). In exceptional cases, data may be transferred to our processing partners outside the European Economic Area. Such data transfer may only take place to the extent necessary, related to our cooperation with these partners and for our internal administrative purposes. We endeavor to transfer data to countries for which the European Commission has determined an adequate level of protection. In the absence of such a decision by the Commission, the security of your data will be ensured by the safeguards we apply, including but not limited to standard contractual clauses approved by the European Commission. You may obtain a copy of these safeguards by contacting us (details in Section III above).

## XI. RIGHT TO FILE A COMPLAINT

You have the right to file a complaint with the President of the Office for Personal Data Protection.

## XII. LIST OF GLOBALWORTH GROUP COMPANIES IN POLAND - DATA CONTROLLERS

Controller	Asset	Contact for GDPR matters
GPRE Management sp. z o.o.	-	<a href="mailto:rodo@globalworth.pl">rodo@globalworth.pl</a>
GPRE Property Management sp. z o.o.	-	<a href="mailto:rodo@globalworth.pl">rodo@globalworth.pl</a>
GW Tech sp. z o.o.	-	<a href="mailto:gwtech.iod@olesinski.com">gwtech.iod@olesinski.com</a>
GW Flex sp. z o.o.	-	<a href="mailto:rodo@globalworth.pl">rodo@globalworth.pl</a>

Imbali sp. z o.o.	-	<a href="mailto:rodo@globalworth.pl">rodo@globalworth.pl</a>
Kusini sp. z o.o.	-	<a href="mailto:rodo@globalworth.pl">rodo@globalworth.pl</a>
Lima sp. z o.o.	-	<a href="mailto:rodo@globalworth.pl">rodo@globalworth.pl</a>
Warta Tower sp. z o.o.	-	<a href="mailto:rodo@globalworth.pl">rodo@globalworth.pl</a>
A4 Business Park sp. z o.o.	A4 Business Park	<a href="mailto:rodo@globalworth.pl">rodo@globalworth.pl</a>
Artigo sp. z o.o.	Silesia Star	<a href="mailto:rodo@globalworth.pl">rodo@globalworth.pl</a>
Bakalion sp. z o.o.	Lubicz Park	<a href="mailto:rodo@globalworth.pl">rodo@globalworth.pl</a>
Centren sp. z o.o.	Green Horizon	<a href="mailto:rodo@globalworth.pl">rodo@globalworth.pl</a>
DH Supersam Katowice sp. z o.o.	Dom Handlowy Supersam	<a href="mailto:rodo@globalworth.pl">rodo@globalworth.pl</a>
Dolfia sp. z o.o.	Batory One	<a href="mailto:rodo@globalworth.pl">rodo@globalworth.pl</a>
Dom Handlowy Renoma sp. z o.o.	Dom Handlowy Renoma	<a href="mailto:rodo@globalworth.pl">rodo@globalworth.pl</a>
Ebgaron sp. z o.o.	Bliski Centrum	<a href="mailto:rodo@globalworth.pl">rodo@globalworth.pl</a>
Gold Project sp. z o.o.	Skylight & Lumen	<a href="mailto:rodo@globalworth.pl">rodo@globalworth.pl</a>
Hala Koszyki sp. z o.o.	Hala Koszyki	<a href="mailto:rodo@globalworth.pl">rodo@globalworth.pl</a>
Ingadi sp. z o.o.	Retro Office House	<a href="mailto:rodo@globalworth.pl">rodo@globalworth.pl</a>
Lamantia sp. z o.o.	Philips House	<a href="mailto:rodo@globalworth.pl">rodo@globalworth.pl</a>
Nordic Park Offices sp. z o.o.	Nordic Park	<a href="mailto:rodo@globalworth.pl">rodo@globalworth.pl</a>
Podium Park sp. z o.o.	Podium Park	<a href="mailto:rodo@globalworth.pl">rodo@globalworth.pl</a>
Rondo Business Park sp. z o.o.	Rondo Business Park	<a href="mailto:rodo@globalworth.pl">rodo@globalworth.pl</a>
Spektrum Tower sp. z o.o.	Spektrum	<a href="mailto:rodo@globalworth.pl">rodo@globalworth.pl</a>
Tryton Business Park sp. z o.o.	Tryton Business House	<a href="mailto:rodo@globalworth.pl">rodo@globalworth.pl</a>
Quattro Business Park sp. z o.o.	Quattro	<a href="mailto:rodo@globalworth.pl">rodo@globalworth.pl</a>
Warsaw Trade Tower 2 sp. z o.o.	Warsaw Trade Tower	<a href="mailto:rodo@globalworth.pl">rodo@globalworth.pl</a>
West Gate sp. z o.o.	West Gate	<a href="mailto:rodo@globalworth.pl">rodo@globalworth.pl</a>
West Link sp. z o.o.	West Link	<a href="mailto:rodo@globalworth.pl">rodo@globalworth.pl</a>