

## PRIVACY NOTICE ON THE PROCESSING OF PERSONAL DATA AND YOUR RIGHTS

In case you are providing your personal data, we as a data controller **UBX2 Objekt Berlin S.à r.l.** having its registered seat at: 21, rue Glesener, L-1631, Luxembourg, ID No.: 216192 (hereinafter referred to as the “**HB Reavis**” or “**we**”), would like to inform you about the processing of your personal data and of your rights related to the said processing.

HB Reavis is part of the HB Reavis Group, which consists of all entities consolidated under the group holding HB Reavis Holding S.A. and HB Reavis Investments Holding S.A. with its headquarters in Luxembourg (hereinafter referred to as the “**HB Reavis Group**”) due to which the reference to HB Reavis Group may be found in the Privacy Notice.

This notice applies to current and former employees, tenants, visitors and contractors. This notice does not form part of any contract of employment or other contract to provide services. This Privacy Notice may be updated from time to time. We encourage you to periodically review this Privacy Notice for the latest information on our privacy practices. Your continued use of our services after the posting of changes to this Privacy Notice will mean that you accept those changes.

It is important that you read and retain this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using that information and what your rights are under the data protection legislation.

***If you are in our construction site or building, in their immediate vicinity (as a visitor, employee, contractors and subcontractor or their employees or for any other purpose) or visit websites or social media related to our building, your personal data may be processed for the following purposes:***

1. Ensuring the safety of visitors and contractors working at the construction site as well as the protection of the construction site and property.
2. Administration of construction log.
3. Administration of control days.
4. Administration of construction visitors.
5. Administration of suppliers phone book.
6. Administration of proposals from suppliers.
7. Hand-over of the fit-out project.
8. Management of health and safety at construction sites.

### **1. Ensuring the safety of visitors and contractors working at the construction site and property**

#### **What is our purpose for and legitimate interest in processing your personal data?**

The protection of our buildings and the safety of the people entering the construction site are the key elements and the number one priority in our business activities. For us to be able to ensure the proper level of protection and safety, we installed a video monitoring system (CCTV). When entering the construction site the CCTV might record you. If you enter the construction site we will process your personal data to produce your visual images by means of an installed CCTV camera system, which records the construction site area and part of the area outside the construction site.

#### **What is our legal basis for the processing of your personal data?**

We process your personal data based on the legitimate interests under Article 6 (1) (f) of GDPR for the protection of our rights and interests and for ensuring security at our premises.

#### **What kind of personal data do we process?**

A visual image of you.

**How long do we store your personal data?**

We store your personal data captured by cameras located at the construction site for 72 hours.

**2. Administration of construction log**

**What is our purpose for and legitimate interest in processing your personal data?**

Every construction has its own administration which consists of several significant documents including the construction log. Construction log also contains personal data of the persons responsible for the various stages of the construction, workers and other relevant persons.

**What is our legal basis for the processing of your personal data?**

We process your personal data on the basis of legitimate interests under Article 6 (1) (f) of GDPR.

**What kind of personal data do we process?**

Name, surname, phone number and e-mail.

**How long do we store your personal data?**

As soon as we no longer need your personal data for the processing purposes for which the personal data have been collected, we will delete them unless the statute-barred period applies.

**3. Administration of control days**

**What is our purpose for and legitimate interest in processing your personal data?**

At most of our constructions, we organize regular control days, which serve for many purposes including marketing, safety, administration and others. People attending these control days are mostly journalists, politicians, state or local controllers, general public and internal stakeholders. From each control day a control day report is created which contains personal data of the persons involved.

**What is our legal basis for the processing of your personal data?**

We process your personal data on the basis of legitimate interests under Article 6 (1) (f) of GDPR.

**What kind of personal data do we process?**

Name, surname, phone number and e-mail.

**How long do we store your personal data?**

As soon as we no longer need your personal data for the processing purposes for which the personal data have been collected, we will delete them unless the statute-barred period applies.

**4. Administration of construction visitors**

**What is our purpose for and legitimate interest in processing your personal data?**

There are many visitors to our construction site on daily basis. Each visitor must be put into evidence so we can ensure the safety at our construction site and protect the people and the property.

**What is our legal basis for the processing of your personal data?**

We process your personal data on the basis of legitimate interests under Article 6 (1) (f) of GDPR.

**What kind of personal data do we process?**

Name, surname, phone number and e-mail.

**How long do we store your personal data?**

As soon as we no longer need your personal data for the processing purposes for which the personal data have been collected, we will delete them unless the statute-barred period applies.

**5. Administration of suppliers phone book**

**What is our purpose for and legitimate interest in processing your personal data?**

As we have numerous contractors working at our construction site, we need to keep contact details to ensure effective communication. For this purpose, we have created a phone book filled with contact details of all contractors that had worked at any of our previous constructions/fit-out or that are working for any of our present constructions/fit-out.

**What is our legal basis for the processing of your personal data?**

We process your personal data on the basis of legitimate interests under Article 6 (1) (f) of GDPR.

**What kind of personal data do we process?**

Name, surname, phone number, e-mail and contact details of the contractor.

**How long do we store your personal data?**

As soon as we no longer need your personal data for the processing purposes for which the personal data have been collected, we will delete them unless the statute-barred period applies.

## **6. Administration of proposals from suppliers**

### **What is our purpose for and legitimate interest in processing your personal data?**

The process of administration of proposals from suppliers is a critical, structured phase within the procurement life cycle and it is an integral part of every fit-out or construction project. Its primary function is to manage all aspects of supplier submissions (often in response to an RFP, RFQ, or RFT) from the moment they are received until the preferred supplier is selected and negotiations begin.

This process ensures fairness, transparency, and objective evaluation, typically involving the following key steps: (i) Sending of requests for proposals to potential suppliers; (ii) Receipt of proposals from potential suppliers; (iii) Comparison of proposals; (iv) Selection of suppliers.

### **What is our legal basis for the processing of your personal data?**

We process your personal data based on the legitimate interests under Article 6 (1) (f) of GDPR for ensuring the procurement process.

### **What kind of personal data do we process?**

Name and surname, e-mail, phone number, company.

### **How long do we store your personal data?**

We store your personal data 3 years from the end of the year in which 1) the claim arose and 2) the obligee obtains knowledge of the circumstances giving rise to the claim and of the identity of the obligor, or would have obtained such knowledge if he had not shown gross negligence.

## **7. Hand-over of the fit-out project**

### **What is our purpose for and legitimate interest in processing your personal data?**

The handover process for a fit-out project is the final, crucial phase that formally transfers the completed space from HB Reavis to the tenant. It is a highly structured procedure designed to ensure all contractual and regulatory obligations are met, and the tenant is fully equipped to operate and maintain the new space.

The process is typically divided into three main stages: (i) Hand-over of the fit-out project to the tenant; (ii) Creation of hand-over protocol; (iii) Signing and archivation of the hand-over protocol.

### **What is our legal basis for the processing of your personal data?**

We process your personal data based on the legitimate interests under Article 6 (1) (f) of GDPR for the protection of our rights and interests.

### **What kind of personal data do we process?**

Name and surname, company, job position.

### **How long do we store your personal data?**

We store your personal data for 5 years after termination of the contract.

## **8. Management of health and safety at construction/fit-out sites**

### **What is our purpose for and legitimate interest in processing your personal data?**

Training of persons with access to the construction site in the area of health and safety. Evidence of all persons with access to the construction site and their health and safety trainings. Creation of a daily report with evidence of all constructions workers for purposes of health and safety. Documentation of health and safety violations and accidents. Creation of incident logs from incidents that resulted in injuries or property damage during the course of construction. Identification of the aggrieved person. Reporting of this incident to the responsible departments and insurance companies.

### **What is our legal basis for the processing of your personal data?**

We process your personal data based on the legitimate interests under Article 6 (1) (f) of GDPR for the protection of our rights and interests and under Article 6 (1) (c) processing is necessary for compliance with legal obligation to which HB Reavis is a subject.

### **What kind of personal data do we process?**

Name and surname, date of birth, photograph, work permit, construction qualification.

### **How long do we store your personal data?**

We store your personal data 3 years from the termination of the existence or non-existence of an obligation to indemnify.

## **General provisions**

Once we no longer need your personal data for the purposes for which we processed it, we will delete your personal data or archive it for the period of time specified by law or the archiving plan.

## **With whom do we share your personal data?**

We may also share your personal data with companies within the HB Reavis Group. We may also be obliged to disclose your personal data to state authorities and public authorities, (courts and law enforcement authorities i.e. (police and prosecutor), and only to the extent necessary as required by applicable and effective law to exercise their power.

Based on several agreements with third parties, which act as our intermediaries or independent operators, we may provide your personal data, to these companies, to the extent necessary to ensure the provision of services specified for individual companies. In addition to these companies, we use the following categories of intermediaries: data centres, hosting - marketing tools - analysis and tracking tools - business operations / management tools - task management and communication tools.

## **From whom do we get the personal data?**

We get the personal data from you, your employer or third party.

## **Do we use automated individual decision-making?**

No, we do not use automated individual decision-making.

## **Do we transfer your personal data to third countries?**

Your personal data are processed within the territory of Germany and other states of the European Union. Your personal data can be processed by a country outside of European Union if this third country has been confirmed by the European Commission as a country with adequate level of data protection or if other appropriate data protection safeguards exist (for example, binding corporate privacy rules or EU standard data protection clauses).

## **What are your rights?**

Your rights as a data subject are stated below. Please note that the exact conditions to exercise these rights are set out in detail in Chapter III of GDPR, while in a particular circumstance not all rights may be exercised.

You have the following rights:

- Access to personal data we process about you
- Rectification of incorrect or inaccurate personal data and adding of incomplete personal data
- Restriction, i.e. blocking of processing of your personal data
- Deletion of personal data in case of the absence of purpose or unauthorized data processing
- Submission of an objection to the processing of personal data if you believe that our data processing is not justified
- To be excluded from automated decision-making
- Listing of personal data in a structured and machine-readable format or for another controller
- Revocation of consent to the processing of personal data
- To lodge a complaint with the supervisory authority

## **How can you exercise your rights?**

Electronically: [dataprivacy@hbreavis.com](mailto:dataprivacy@hbreavis.com)

In writing to the address: HB Reavis Germany GmbH, Hermann-Blankenstein-Straße 5, 10249, Berlin, Germany, at hands of: legal department, or to HB Reavis Group a. s., at hands of: compliance department, Mlynské nivy 5, 821 09 Bratislava, Slovak Republic

We strive to protect your privacy as much as possible and therefore we process your personal data in compliance with GDPR and all other relevant laws. However, if you disagree with the way we handle your personal data, you can exercise your rights via our Data Protection Officer at: HB Reavis Group a. s., Mlynské nivy 5, 821 09 Bratislava, Slovak Republic, email: [dataprivacy@hbreavis.com](mailto:dataprivacy@hbreavis.com)

Or you can file a complaint with the supervising authority regarding the processing of your personal data. Your local supervisory authority may be found at: [https://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index\\_en.htm](https://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm)

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