



Information about the processing of personal data and cookies

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1. Who is the controller of your personal data?

Our company **Savills CZ s.r.o.**, Business ID No. 055 61 281, with its registered office at Na Florenci 2116/15, 110 00 Prague 1, registered in the Commercial Register maintained by the Municipal Court in Prague, Section C, Insert 265898, ("**Savills**", "Controller", "our" or "we"), as the controller of your personal data, would like to inform you about the details of its processing through this document. Any reference to the terms "you" or "your" refers to you as the data subject(s) whose personal data we process.

We consider your personal data to be confidential and we process it in accordance with the applicable data protection legislation, which is in particular Regulation (EU) 2016/679 of the European Parliament and of the Council - General Data Protection Regulation ("**GDPR**"); Act No. 110/2020 Sb., on the processing of personal data, as amended, Act No. 253/2008 Sb., on certain measures against the legalization of the proceeds of crime and the financing of terrorism ("**AML Act**"), Act No. 480/2004 Sb., on certain information society services and others.

2. What is personal data?

Personal data is information about you as a natural person on the basis of which you can be identified. This may include, but is not limited to, your name, contact details, date of birth, bank account details or any other information about you that enables us to identify you. The scope of personal data depends on the purpose for which we process the data.

Certain personal data are also referred to as "special categories of personal data" under the GDPR. This category includes information relating to health, racial or ethnic origin, religion or political opinion, philosophical beliefs and sexual orientation. Some of this data may be processed by us only exceptionally for certain purposes in compliance with other legal obligations.



3. To what extent and for what purposes do we process your personal data?

We process your personal data to the extent necessary to fulfil the stated **purpose**, which depends on the type of services we provide to you. Below you will find information on these processing purposes and what personal data we need.

We may also ask you at the beginning of our relationship whether you have any relatives or close associates at Savills so that we can consider any potential conflicts of interest and determine how to deal with them in accordance with our obligations under the law or internal rules.

We obtain the data below directly from you. However, we may also use publicly available registers and records (commercial register, land register, trade register, insolvency register, VAT register and others) or other publicly available information. Data may also be provided to us by third parties, such as your legal representative.

In most cases, we provide real estate, investment or other services to commercial companies or other legal entities, so we mainly process personal data of representatives of these companies or other persons associated with the company (see below). Exceptionally, our clients are natural persons.

Real estate activities - buying, selling, renting of real estate

a) Sale or lease of the property:

- For the purpose of **concluding and fulfilling the Contract for the mediation of** the sale or lease of your property, we will process in particular:
 - if you are a representative of a legal entity or its contact person: your name, surname, telephone number and e-mail, position, or
 - if you are the owner of the property, then your date of birth, personal ID number, business name and registered office or residence.

We also use the above data for the purpose of contacting you to arrange tours, to inform you of any offers received for the property and to mediate the entire transaction between you and the interested party or to provide you with our related negotiation advice.

- We also use the personal data of property owners to the above extent for the purpose of fulfilling **legal obligations in the field of taxation and accounting**.
- For the property owner's representatives, we also require details of the representation (e.g. power of attorney, document proving that you are the authorized statutory representative or guardian, executor of the will or administrator of the estate of the deceased, etc.) and his/her personal data such as name, surname, date of birth, residence and other data for identification and control purposes under the AML Act (see below);
- In the case of a sale of a property, as well as in the case of a property lease where the monthly rent exceeds 10,000 EUR, we also process personal data necessary to identify you (in most cases, you as a representative of a legal entity), including identity card data (permanent address, birth number, place and date of birth, gender, nationality, identity card data including its number, date of issue, validity and issuing authority), in order to **comply with the identification and control requirements set out in the anti-money laundering and anti-terrorist financing legislation, in particular under the AML Law**. In this regard, we may also process information and data on the purpose and intended nature of the transaction, whether you are a politically exposed person and why, identify persons in the ownership and management structure of the legal entity, including the beneficial owner, verify the source of funds or other assets related to the transaction, verify the origin of assets of politically exposed persons, or process other data



pursuant to the AML Act. In this respect, we are entitled under the AML Act to request relevant documents from you and to take copies of them, including, where appropriate, identity cards;

b) If you wish to buy a property that we offer for sale:

- in order to **find a suitable property** to purchase and contact you, in most cases as a representative of a legal entity, we will request your name, surname, telephone number, email, position and such details as are relevant to the specific requirements for the property;
- For the **buyer's representatives**, we will also require details of that representation (e.g., a power of attorney, a document proving that you are the authorized statutory representative or guardian, executor of the will or administrator of the estate of the deceased, etc.) and personal details of the representative such as name, surname, date of birth, place of residence and other details for identification and control purposes under the AML Act (see below);
- In the case of property owners as natural persons, we also process the following personal data: name, surname, business name, place of residence, date of birth, registered office, ID number, bank account number, information on joint property of spouses, information on the loan granted, etc. We also use this personal data for the purposes of complying with **legal obligations in the field of taxation and accounting**;
- When you purchase a property, we may process personal data necessary to identify you (or your representative), including data from your identity card (permanent address, birth number, place and date of birth, gender, nationality, details of the identity card including its number, date of issue, validity and issuing authority), in order to comply with the **identification and control requirements set out in anti-money laundering and anti-terrorist financing legislation, in particular under the AML Act**. For this purpose, we may also process information and data on the purpose and intended nature of the transaction, whether you are a politically exposed person and why, identify persons in the ownership and management structure of the legal entity, including the beneficial owner, verify the source of funds or other assets related to the transaction, verify the origin of assets of politically exposed persons or process other data in accordance with the AML Act. In this respect, we are entitled under the AML Act to request relevant documents from you and to take copies of them, including, where appropriate, identity cards;

c) If you wish to rent the property we offer:

- for the purpose of **finding a suitable property** to rent and contacting you, we will ask for your name, surname, telephone number, email, position and such data as are relevant to the specific requirements for the property. We also process this data for the purpose of providing brokerage and advisory services related to the rental of the property.
- If the tenant is a natural person, we also process the following personal data: name, surname, business name, residence, date of birth, registered office, Business ID number, bank account number for the purpose of mediating the lease and related contracts. We also use this personal data for the purposes of complying with **legal obligations in the field of taxation and accounting**;
- In the case of renting a property where the monthly rent exceeds 10,000 EUR, we may process personal data necessary to identify you (or your representative), including identity card data (permanent address, birth number, place and date of birth, gender, nationality, identity card data including its number, date of issue, validity and issuing authority), in order to comply with **the requirements set out in anti-money laundering and anti-terrorist financing legislation, in particular under the AML Act**. For this purpose, we may also process information and data about the purpose and intended nature of the transaction, whether you are a politically exposed person and why, identify persons in the ownership and management structure of the legal entity,



including the beneficial owner, verify the source of funds or other assets related to the transaction, verify the origin of your assets or process other data under the AML Law. In this respect, we are entitled under the AML Act to request relevant documents from you and to take copies of them, including, where appropriate, identity cards.

Investment services

- For the purpose of providing **investment counselling**, we process the following personal data for the purpose of the relevant investment contracts and their performance (e.g., agency agreement): for representatives of legal companies, name, surname, position, contact details such as telephone and e-mail; in the case of clients - natural persons, also residence, date of birth, business name, registered office, registration number, bank account, etc. We also use this personal data for the purposes of complying with **legal obligations in the field of taxation and accounting**.
- For the purposes of **identification and control under the AML Act** for investment services, we also process the following data: personal data necessary for your identification (or identification of your representative), including data from your identity card (permanent address, birth number, place and date of birth, gender, nationality, data on the identity card including its number, date of issue, validity and the authority that issued it). For this purpose, we may also process information and data on the purpose and intended nature of the transaction, whether you are a politically exposed person and why, identify persons in the ownership and management structure of the legal entity, including the beneficial owner, verify the source of funds or other assets related to the transaction, verify the origin of assets of politically exposed persons or process other data in accordance with the AML Act. In this respect, we are entitled under the AML Act to request relevant documents from you and to take copies of them, including, where appropriate, identity cards.

Consulting services in the field of development, construction, projects and property management

- For the purposes of providing counselling in the above areas, we process the following personal data when negotiating consultancy contracts and their performance (e.g., property management contract, service contract, etc.): for representatives of legal entities - name, surname, e-mail, telephone, position, for clients - natural persons - residence, date of birth, business name, registered office, Business ID number, bank account, etc. We also use this personal data of our natural person clients for the purpose of fulfilling legal obligations in the field of taxation and accounting.

Provision of accounting services

- For the purposes of providing counselling in the field of accounting and taxes, we process the following personal data when negotiating and executing a consulting contract: for representatives of legal entities - name, surname, e-mail, telephone, position, for clients - natural persons, also registered office, Business ID number, or residence, business name, date of birth, bank account, etc. We also use this personal data for the purposes of complying with legal obligations in the field of taxation and accounting.
- As we may also process personal data of third parties (e.g., your customers, suppliers, debtors, etc.) for you as a client in the context of accounting services, our company is in the position of a **personal data processor**. For this purpose, the relevant articles on the processing of personal data are added to the service contract.



Contact form on the website

- Since you can also contact us via the contact form on our website, we process the following personal data on the basis of our legitimate interest for the purpose of processing your enquiry and, where applicable, negotiating a follow-up contract: name, surname, telephone number, e-mail, content of the enquiry / services requested and other requirements.

Maintaining a user account on the website

- You can also register a user account on our website to keep up to date with property and service offers. For these purposes, we process the following personal data: name, surname, telephone number, e-mail, company name and address, content of the enquiry / service requested and other requirements. You can cancel your account by sending a user account cancellation request to prague@savills.cz

Marketing and commercial communications

- If you subscribe to our website to receive commercial communications, which may be, for example, market research outputs, press releases, news or current market reports, then we process the following personal data on the basis of your consent: name, surname, e-mail, telephone, company name and address.
- You may withdraw your consent to receive commercial communications at any time by using the link provided in each commercial communication email or by contacting us in accordance with section 11 of this Information.

Suppliers

If you deliver goods and services to us, we process your name, surname, registered office, Business ID number, VAT number, business name, telephone number, e-mail, position, bank account for the purpose of negotiating and fulfilling the relevant contract and for the fulfilment of legal obligations in the field of tax and accounting. In the case of representatives of law firms, this includes contact details such as name, surname, e-mail, telephone, position.

4. What is the legal basis for our processing of your data?

Based on data protection legislation, we are only entitled to use your personal data with your permission or if we have another legal reason (title) to do so. We rely on the following lawful grounds for processing your information;

- we process personal data for the purpose of negotiating, concluding and performing **the contract**;
- when we have to comply with **a legal obligation** (e.g., under tax, accounting, anti-money laundering legislation, etc.);
- where processing is necessary to carry out activities that are in Savills' **legitimate interests**, in particular:
 - processing of data that is necessary for us to promote our business, brand and services (so-called direct marketing); measuring the reach and effectiveness of our campaigns;
 - processing of personal data that is necessary to improve our knowledge of real estate, this includes market analysis and research to better understand real estate



trends and provide better knowledge along with more tailored and relevant services to our customers in the future;

- processing of personal data that is necessary for the efficient operation of administrative and technical aspects, which typically includes: verifying the accuracy of data, processing for network and information security purposes, i.e., to take steps to protect your information from loss, damage, theft or unauthorized access, or to respond to your enquiry via the contact form or to comply with your request in relation to the exercise of the rights set out below;
- processing of personal data for the purpose of defending or pursuing legal claims.
- we process personal data on the basis of your **consent** (e.g., to send you commercial communications, maintain your user account or store cookies and related data processing for statistical and marketing purposes).

5. To which processors and recipients do we transfer personal data?

Recipients of personal data

In providing our services, we may work with various entities to whom we transfer your personal data so that we can provide you with the service in a proper and timely manner. These entities are usually independent controllers of your personal data. This may include:

- in the case of real estate services or investment services, we may share your personal data with your nominated legal representatives and legal representatives acting for the other party to a business transaction where this is necessary for the transaction or investment service;
- in the case of compliance with legal obligations, we may provide your personal data to state authorities and institutions to the extent and within the limits set by law (e.g., land register authorities, tax administrators, etc.);
- in the case of defending and enforcing legal claims, we may also share your personal data with courts, arbitrators, bailiffs, notaries, etc;
- we may also be assisted with the processing of your personal data by external legal advisors, auditors or tax advisors.

Personal data processors

- we use service providers who process personal data on our instructions. These are mainly providers of IT infrastructure and systems and suppliers of information technology, as well as applications for searching or screening persons for the purpose of anti-money laundering measures or for sending commercial communications and conducting emailing campaigns.
- we may also share your personal data with the relevant company within the Savills plc (UK) group to ensure that we can deliver the services we provide, where necessary.
- The website, its operation and hosting is managed by Savills (UK) Limited.
- cookies are provided by the following processors: Savills (UK) Limited
- other processors may be, for example, companies in the Savills plc group

6. What happens if you do not provide us with the requested information?

We need some of your personal data to provide the services you have requested, for example:

- if we mediate the sale of your property, we need to know your contact details so that we can send you updates on offers and the progress of the sale;



- if we are looking for a property for you, we will need further details of your specific requirements to find you a suitable property;
- we cannot do without your personal data even when mediating a real estate transaction and providing relevant counselling;
- we also need some of your data and other information to comply with our legal obligations. For example, it may be your identity card data to comply with our obligations under AML law to prevent money laundering and terrorist financing.

For the scope of personal data for individual purposes, see section 3 above of this Information. If you do not provide us with the personal data necessary to process for the relevant purpose, we may not be able to provide the service or continue to provide it.

7. Security of personal data

The security of personal data is very important to us and we use technical and organizational measures to prevent unauthorized access to your personal data and to comply with the legal requirements for processing it.

8. How long do we keep your personal data?

The period for which we will retain your personal data will depend on the type of service you request or the duration of the purpose for which we process the personal data. We may process personal data for multiple purposes at the same time.

If you contact us with an interest in a property or in mediating a sale and no contract is concluded, we process your personal data for a maximum of 12 months from the end of the contact with you, unless there is another purpose of processing.

In the case of contractual obligations, we generally retain personal data for up to 10 years after the termination (fulfilment) of the contractual relationship, due to the running of the limitation period for individual claims arising from the contracts.

For tax and accounting documents and documentation, we retain personal data for the period required by law, which may be up to 10 years.

For personal data processed for the purposes of the AML Act, we are obliged to archive all your data obtained in the context of identification and control for a period of 10 years.

For sending commercial communications, we process personal data until your consent is withdrawn.

For cookies - see table below

9. Cross-border transfers of your personal data

As our parent company, Savills plc, is based in the United Kingdom (UK) and provides us with all IT services and infrastructure as well as other services, your personal data is also transferred, stored or processed in the UK. Following the European Commission's decision of 28 June 2021, it is determined that the UK provides an adequate level of protection for personal data. Personal data can therefore be transferred to the UK without the need for any additional measures applicable to transfers to third countries. If your data should nevertheless be transferred to a third country (outside the EU and EEA)



that does not have an adequate level of personal data protection as under Czech law, we will inform you of this and ensure that relevant guarantees are provided in relation to your personal data, i.e., in particular:

- it can be transferred to a country outside the EEA if the European Commission has decided that the third country, a specific territory or one or more specific sectors in that third country, or that international organization provides an adequate level of protection;
- standard contractual clauses are concluded between the European Commission and the receiver. This means that they must protect them to the same standards as organizations in the EEA;
- it can be passed on to organizations that have implemented binding corporate rules approved by the EU supervisory authority.

10. What rights do you have in relation to your personal data?

You have the following rights in relation to your personal data which you can exercise against us:

- **the right to be informed about how we process your personal data;**
- **the right to access the personal data** we hold about you;
- **the right to request the rectification of your personal data** if you believe that it is incorrect, incomplete or inaccurate;
- **the right to request the erasure of your personal data** in the following cases:
 - where Savills continues to process the personal data after the time necessary for the purpose for which it was originally collected;
 - if you have given your consent to the processing of personal data and you withdraw it;
 - where Savills relies on legitimate interests as a lawful basis for processing, you object to that processing and there is no reason that would allow us to continue processing it;
 - where personal data is processed unlawfully (i.e., in breach of the requirements of data protection legislation);
- **ask us to restrict the processing of personal data** (i.e., that we may temporarily make your data unavailable, delete or otherwise restrict its processing), in particular if you believe that:
 - your personal data is inaccurate and we need to verify the accuracy of the data;
 - the processing of your personal data is unlawful;
 - we no longer need the personal data but you request that we continue to retain it for the purpose of establishing, exercising or defending any future legal claim you may have; or
 - if you have objected to the processing of your personal data and we need to assess whether the legitimate grounds of us as the controller outweigh the legitimate grounds of you as the data subject;
- **request the transfer of your personal data** which you have provided to us with your consent or which is processed under contract to a third party in a commonly used electronic format, provided that this is permitted by law and technically feasible;
- **you may object to the processing of your personal data** carried out on the grounds of our legitimate interests, after which the processing of your personal data will be terminated unless it can be demonstrated that there are compelling legitimate grounds for the processing which override your interests, rights or freedoms, in particular if the ground is the enforcement of legal claims. You can also object at any time to the processing of personal data for direct marketing purposes (including profiling). In this case, the personal data will no longer be processed for these purposes. If you object to the processing of your personal data, please state the reasons why we should not process your personal data in the way we currently process it.



If you would like to exercise any of your rights, please contact us by email at prague@savills.cz or in writing to our company address listed in section 1 of this Information.

Please note that we retain all communications relating to the exercise of your data subject rights in order to demonstrate compliance with our data protection obligations in the event of a dispute or an inspection by a supervisory authority.

11. Complaints and contact details

If you have any comments, questions about the processing of your personal data or exercise your rights as a data subject, please contact the person responsible for compliance at prague@savills.cz, where the relevant responsible employee will take up your request and try to resolve your problem, or by writing directly to our company Savills CZ s.r.o, Na Florenci 2116/15, 110 00 Prague 1.

You also have the right to **file a complaint with the supervisory authority** for data protection in your country, i.e., the Office for Personal Data Protection of the Czech Republic, address: Pplk. Sochora 27, 170 00 Prague 7, e-mail address: posta@uouu.cz, website: www.uouu.cz

12. Cookies

Our website may process various types of technical information and data during your visit, which may include personal data. This information is processed on the basis of our legitimate interest for the purpose of the technical operation of the website and its security. For example: IP address, date and time of the request, content of the request (the exact web page you accessed), HTTP access status/status code, volume of data transferred in each case, the web page that generated the request, browser, operating system and its interface, browser language and version, etc.

What are cookies?

A cookie is a small text file that is stored on your device when you visit a website and allows websites to recognize your device by certain data, such as IP address, browser type, operating system, etc. Cookies include other tracking technologies such as pixels, beacons, etc. Cookies are used to help users browse the website more efficiently and to perform certain functions and provide information to website owners. They may be used to generate statistics about site traffic and visitor behavior and for marketing purposes, i.e., we may display advertising about our services to you in cooperation with third parties on various places on the internet or on social networks. The specific purpose is indicated for the relevant cookies in the table below.

What cookies are used by Savills?

When you browse our website, we automatically use cookies that are necessary for the performance and functioning of the website (so-called technical cookies). We can only store other cookies on your device and process the personal data collected if you have given us your explicit consent in the cookie bar. We retain this data for a maximum of 12 months after consent has been given. You can change your cookie settings in your web browser under Settings - Privacy & Security.

The table below lists the cookies used by our website and provides a description of how each cookie works, how long they are stored and their purposes. Clicking on the "+" symbol will expand the box and provide further explanation for each cookie. If there is further information about a cookie on an external website, we provide a link to the relevant website in the "Further information" section.



TABLE

1. **gpsLanguageCode**

Purpose - Records the default ISO language code that is updated by user selection.
Further information – Permanent

2. **gpsCountryCode**

Purpose - Records the ISO country code, which is the default setting for the site and is updated by user selection.
Further information - Permanent

3. **gpsId**

Purpose - Unique user identifier
Further information - Permanent

4. **Google Analytics**

Purpose - The Savills website uses Google Analytics, which is provided by Google. It sets a cookie to evaluate your use of our website and to compile reports for us about activity on our website.

More information - How to reject or delete this cookie -
<http://www.google.com/intl/en/privacypolicy.html>

5. **Google Adwords**

Purpose - The Savills website uses Google Adwords for remarketing or similar purposes to serve ads on other third party websites.

More information - Opt-out: <https://support.google.com/ads/answer/2662922?hl=en-GB>

6. **DoubleClick**

Purpose - Effectiveness of advertising and marketing. A floodlight tag is an image pixel that is created within DFA and is located on the advertiser's website. We can use it to optimize retargeting, reporting and matching of online ads.

More information - How to refuse or delete this cookie -
https://adssettings.google.com/authenticated?hl=en#display_optout

7. **Facebook**

Purpose - Facebook may use cookies, web beacons and other storage technologies to collect or receive certain types of information and Savills may use this information to deliver targeted advertisements.

More information - Further information: <https://en-gb.facebook.com/help/568137493302217>

8. **Yandex**

Purpose - Savills uses the Yandex Metrika analytics platform to evaluate your use of our website.

More information - Opt-out: <https://yandex.com/support/metrika/general/opt-out.xml>



9. TV Squared

Purpose - TV Squared allows us to monitor the effectiveness of our TV advertising. TV Squared collects information anonymously, including the number of visitors to the site, what site or search engine they came from, and what pages they visited. TV Squared does not collect any personal data.

10. iGo digital

Purpose - The iGoDigital service used by our ExactTarget email marketing platform will place one or more cookies on your computer or mobile device when you visit our website. We use cookies to improve your experience, including enhanced browsing, location maintenance and non-personal app data. The cookie is not used to store personal or private information.

More information: <http://pages.exacttarget.com/iGoDigitalPrivacy>

11. Giosg Live Chat

Purpose - The Savills website uses a third party live chat service, Giosg. This includes the use of cookies for personalization and analysis. Tracking and storage of data including IP address, content of chat conversations, URLs visited, referring URL, timestamp, operating system, device, browser.

More information: <https://www.giosg.com/terms-of-service>

12. Webtrends

Purpose - The Savills website uses WebTrends Analytics to evaluate activity on our website.

Further information and how to opt-out: <https://kb.webtrends.com/articles/Information/Opting-out-of-Tracking-Cookies-1365447872915>

How do I restrict or remove cookies?

You can delete cookies at any time via your browser's security settings. You can configure the browser settings as you wish. In particular, you can refuse to accept third-party cookies or even all cookies. However, please note that in this case you may not be able to use some of the features on this website.

Your web browser may allow you to restrict or delete cookies set by these websites. The browser's help function should tell you how to do this. Alternatively, you can visit www.allaboutcookies.org which provides general information about cookies and how to manage cookies on your computer.

To exclude Google Analytics tracking on all websites, visit <https://tools.google.com/dlpage/gaoptout>

13. Changes to Information on the processing of personal data

Savills may amend and update this privacy notice at any time. An updated version will always be published on the Savills website.

Latest update: 19 May 2023