

GENERAL PRINCIPLES FOR THE PROTECTION AND PROCESSING OF PERSONAL DATA

This General Policy applies to the processing of personal data carried out by SEA.investments s.r.o., with registered office at Jana Nepomuckého 93, 252 19 Chrášťany, ID No. 14328470, registered in the Commercial Register kept at the Municipal Court in Prague, Section C, Insert 364014 ("**Company**") in relation to its clients and suppliers ("**General Policy**").

The Company processes personal data of data subjects in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC, effective from 25 May 2018 ("**GDPR**") and other legislation governing the protection of personal data.

- **CONTACT DETAILS**

- The company hereby informs you of the following contact details:
 - Delivery address: Jana Nepomuckého 93, 252 19 Chrášťany
 - Phone: +420 606 073 939
 - Email address: info@sea.investments

- **SOURCES OF PERSONAL DATA**

- The Company obtains personal data primarily directly from data subjects through orders and inquiries from data subjects, email communication, telephone communication, websites, contact form on websites, social networks, business cards, etc. Personal data is also obtained from publicly accessible registers, lists and records (e.g. commercial register, trade register, land register, public telephone directory, etc.).

- **SCOPE OF PROCESSING OF PERSONAL DATA**

- Personal data is processed to the extent that the relevant data subject has provided it to the Company, in connection with the conclusion of a contractual or other legal relationship with the Company, or which the Company has otherwise collected and processes in accordance with applicable law or to fulfil our legal obligations.

- **PROCESSING OF PERSONAL DATA OF THE COMPANY'S CLIENTS**

- In order to ensure the proper provision of services, the Company must process personal data of its clients as well as persons who have expressed an interest in using the Company's services ("**you**" or "**data subject**"). In particular, the Company processes the following categories of personal data about these data subjects:
 - Identifying information (especially name, surname or nickname);
 - contact details (e.g. contact and/or delivery address, e-mail, telephone, IP address);
 - details of services provided or requested;
 - payment details;
 - Cookies.

- Execution of a service contract or other agreement between the Client and the Company
 - We process the personal data of the Company's clients primarily for purposes related to the performance of obligations under a contract for the provision of our services (real estate brokerage, property management) or in connection with the implementation of measures necessary to conclude such a contract. The legal title of the processing in this case is Article 6 (1) (b) GDPR. The processing of this personal data is therefore necessary in particular for these purposes:
 - negotiations on the intention to enter into a contractual relationship with the Company and the performance of that contractual relationship;
 - answering a question, request or other comment sent by the client via the Company's contact form;
 - the provision of other services and performance related to the subject of the concluded contractual relationship;
 - The provision of the Client's personal data and their subsequent processing for these purposes is a prerequisite for the conclusion of a contract between the Client and the Company. Failure to provide the required personal data may result in the impossibility of performance of the contract and therefore its nullity from the outset;
 - The Company processes the personal data in question for the duration of the contractual relationship between the Client and the Company. In justified cases, the period of processing of personal data may exceed the duration of the contractual relationship, in particular for the purpose of asserting legal claims of the Company from expired contracts. The Company undertakes that the period of processing of personal data in this case will never exceed the statutory limitation period of 10 years.
- Legitimate interests of the Company:
 - Personal data of clients are also processed for the purposes of the Company's legitimate interests in disseminating commercial communications and direct marketing, as well as for purposes related to optimizing and improving the quality of the services we provide. The legal basis for processing in this case is Article 6(1)(f) GDPR. The processing of personal data is therefore necessary in particular for these purposes:
 - the legitimate interest of the Company, where the Company may process certain categories of personal data of its past and present clients for direct marketing purposes;
 - dissemination of commercial communications by electronic means (in particular e-mail, SMS messages, telephone) pursuant to Act No. 480/2004 Coll., on certain information society services and on amendments to certain acts;
 - improving the quality of services provided and the possible development of new services;
 - defending the Company's legal claims;
 - The processing of the personal data in question for these purposes is based on the legitimate interests of the Company, except where these interests are overridden by the interests or fundamental rights and freedoms of the data subject requiring the protection of personal data, in particular where the data subject is a child. In case of any doubt in relation

to the legitimate interests of the Company, you have the right to object to the processing at any time in the terms and manner set out in these General Terms and Conditions;

- The Company shall process the personal data in question for a period of time proportionate to the duration of its legitimate interest. The Company undertakes that the period of processing of personal data in this case will never exceed 10 years.
- Functioning of the Company's website
 - The Company operates the website <https://sea.investments/>. As such, it must process personal data to ensure the optimal functioning of this website and its optimization. Specific information on the processing of this personal data, in particular cookies, can be found [here](#).
- Performance of the Company's legal obligations
 - The company is obliged to comply with the entire legal system of the Czech Republic, especially the laws in the area of billing for our services and keeping accounting and tax records. The legal title of processing in this case is Article 6 (1) (c) GDPR. The provision of personal data is therefore a legal requirement in these cases;
 - The Company is also obliged to transfer your personal data to the relevant government authorities, either in compliance with a legal obligation or upon request. These authorities may include, for example, the tax authorities, the social security administration, public health insurance companies, the courts or other authorities. In such cases, the transfer of personal data shall only take place under the regime established by the relevant legislation or decision of the authority concerned;
 - For these purposes, personal data is processed for the period of time specified by the relevant legislation. If you would like more detailed information, please contact the Company using the contact details above.
- **METHOD OF PROCESSING AND PROTECTION OF PERSONAL DATA**
 - The Company is committed to the following guiding principles when processing personal data:
 - when storing, securing and further processing personal data, the Company shall only act in accordance with applicable law, in particular in accordance with the GDPR;
 - The Company processes your personal data only for the purposes and in the manner set out in this General Policy;
 - The Company has appropriate technical and organisational measures in place to ensure an adequate level of security of personal data. All personal data provided to the Company by data subjects is secured by standard procedures and technologies, but it is not objectively possible to guarantee 100% security of personal data of data subjects. In this context, the Company regularly reviews the security measures, which are then updated as necessary;
 - the data subject always has the possibility to contact the Company at any time in a simple way, using any of the channels mentioned in this General Policy.
- **RECIPIENTS OF PERSONAL DATA**
 - Third parties may also be recipients of your personal data. The Company carefully chooses its business partners to whom it entrusts data subjects' data and who are able to ensure that the

technical and organisational security of data subjects' personal data is such that unauthorised or accidental access to such data or other misuse of such data cannot occur.

- In the context of legal relations with our business partners, they are bound by, among other things, confidentiality obligations and must not use the data provided for any purposes other than those for which we have made it available to them and must also ensure additional measures to secure the personal data of data subjects.
- The third parties that may have access to the personal data of data subjects, depending on the nature of the service that the data subjects use or have used, are:
 - persons who provide the technical operation of a particular service for us or operators of the technologies we use for our services;
 - persons who provide accounting or other economic services for us;
 - persons who ensure the security and integrity of our services and websites and regularly test this security for us;
 - providers of postal, communications and electronic communications services;
 - persons to whom we provide data for the purpose of analysing traffic to our websites;
 - payment service providers and payment processors for the purpose of securing and executing payment transactions;
 - business partners or sponsors who participate in the organization of our events, conferences, seminars, etc.;
 - persons who provide us with the recovery of our company's debts;
 - operators of advertising systems in connection with targeted advertising;
 - operators of CCTV, access control and other security systems installed in our company's building to protect health and property and to secure the processing of personal data;
 - operators of technical solutions that enable us to show you only content and advertising that is relevant to you;
 - marketing and research agencies for the purpose of marketing processing or investigations and for offers of trade, services and products.
- Under certain precisely defined conditions, the Company is obliged to transfer certain personal data of data subjects to the Police of the Czech Republic, the Financial Office, the Office for Personal Data Protection and other public administration authorities.
- **TRANSFER OF PERSONAL DATA TO THIRD COUNTRIES**
 - For the purpose of fulfilling contracts concluded with the data subject, our Company transfers personal data from time to time as necessary and to the extent necessary to countries outside the European Union (Albania, and other countries according to the specific offer). In this way, the Company transfers personal data to the following persons:
 - persons from the group of which the Company is a part;
 - banking and other financial institutions;
 - notaries and other public authorities.

- Personal data are only ever transferred if this is necessary for the performance of a contract between the data subject and the Company or for the implementation of measures taken prior to the conclusion of the contract at the request of the data subject. Except as stated above, the Company does not transfer personal data of data subjects to a third country.
- In the event that personal data of data subjects is transferred to third countries outside the EU, this will be done in accordance with the legal requirements and in any case the protection of the personal data of data subjects will be ensured. The Company will inform the data subject of any such transfer.
- **RIGHTS OF DATA SUBJECTS**
 - In connection with the processing of personal data, you may exercise the following rights as a data subject:
 - the right to information regarding the personal data of data subjects processed by the Company, the purpose and nature of the processing of personal data, including information on the potential recipients of the personal data;
 - the right to access the data provided by the data subject to our company, including on our website. If this right is exercised, the data subject will be informed whether and which specific personal data about him or her is being processed. All data will be made available together with information about their processing;
 - the right to rectification of personal data if it is inaccurate or incomplete in any way. Only in the case of up-to-date data can the Company effectively deal with data subjects' responses;
 - the right to an explanation and rectification of the defective situation (e.g. blocking, rectification, completion or destruction of personal data) if the data subject believes that the Company processes personal data in violation of legal regulations;
 - the right to erasure of personal data (the so-called right to be forgotten) or their limited processing if they are no longer necessary for the purposes stated or if the Company no longer has a legitimate reason to process the personal data, including in cases where the data subject does not consent to their further processing. Upon exercising this right, the Company shall determine whether there are legitimate grounds for further processing of the personal data and, where appropriate, erase the data subject's data in whole or in part;
 - the right to transfer the automated personal data obtained on the basis of the data subject's consent to another entity, where the Company will transfer the data subject's personal data in a commonly used format to the data subject or to another controller as requested by the data subject;
 - the right to object to the processing of personal data, including profiling, which we carry out on the grounds of legitimate interest. Similarly, he or she may object to processing where we process the data subject's personal data for direct marketing purposes. In this case, we will no longer process your personal data for this purpose;
 - the right to withdraw consent to the processing of personal data where the data subject has provided us with consent to the processing of personal data for purposes requiring consent. Processing of personal data that occurred before the withdrawal of consent is lawful. The Company will respond to requests from data subjects to exercise their rights without undue delay within 30 days of receipt of the request. However, the time limit may be extended by a

further 30 days if necessary. We will always inform the data subject of any such extension, including the reasons for it;

- the right to contact our company or the Office for Personal Data Protection in the event of a suspected violation of your rights and to request appropriate remedies, such as refraining from the conduct in question by our company, remedying the situation, or providing an apology. The supervisory authority is the Office for Personal Data Protection, Pplk. Sochor 27, 170 00 Prague 7, <https://www.uoou.cz/>.
- If you believe that the Company is processing personal data in violation of your right to protection of your private or personal life, you may request an explanation from our Company and the elimination of such situation.
- You can exercise all your rights by contacting the contacts listed in this General Policy.
- **LESSONS LEARNED**
 - The content of our website is protected by the relevant provisions of intellectual property legislation. If you use the content of our website in any form, you must have our express written consent.
- **CHANGE TO THE GENERAL PRINCIPLES**
 - We reserve the right, if necessary, to amend these General Principles, in particular with regard to the development of national legislation, the decision-making practice of the Office for Personal Data Protection and other recommendations and opinions of other bodies whose outputs relate to the area of personal data protection. We encourage you to review this General Policy periodically to stay up-to-date on how we help protect the personal data we process about you.
- **CONTACT**
 - If you have any questions about data protection or withdraw your consent to further processing of your personal data, you can contact us at the contact details above.
 - In this context, we would like to inform you that we may require you to provide us with appropriate proof of your identity in order to verify your identity. This is a precautionary security measure to prevent unauthorised persons from accessing your personal data.
- **EFFICIENCY**
 - These General Principles are effective from 1 June 2022.