

PRIVACY POLICY
for contractors and tenants
Personal data protection under the General Data Protection Regulation
(GDPR)

This information relates to personal data that **R4R Leasing Sp. z o.o. with its registered office in Warsaw at al. Szucha 6, 00-582 Warsaw, KRS number: 0000600776 (the "Company")** collects as the administrator of personal data, to ways of making use of them, as well as to the rights of natural persons related to the collection and use of such data. If you have any questions or comments, please contact rodo@r4r.pl

In order to conduct its business operations, the Company collects and uses information identifying natural persons (also called "**personal data**"), including information about persons cooperating with the Company.

As part of our commitment to protect the personal data, we would like to inform you in a transparent way:

- why and how the Company collects, uses and stores your personal data;
- on what legal basis your personal data is processed, and
- what are your rights and our responsibilities in relation to this processing.

1. Scope of information

In this clause, the Company informs about all forms of the use of personal data ("**processing**") in Poland in relation to natural persons who are:

- a) contractors, tenants and persons living with them or providers (including potential ones) of the Company,
- b) accomplices, employees, statutory representatives, proxies or representatives of the entities listed in item a) above,
- c) other persons whose data we process for the purposes of invoicing or processing invoices, and
- d) employees or representatives of public bodies

(jointly „**You**” or „**Contractors**”).

2. Types of personal data

1. Data provided by Contractors

In connection with the cooperation between You and the Company, which may consist in particular in the provision of services, property management, letting/renting premises by You or for You, as well as delivery of goods to the Company, we may process Your personal data, such as:

- a) name and surname, company name and business address, as well as correspondence address,
- b) numbers held in the relevant registers (for example NIP number or REGON number),
- c) PESEL number (Polish citizen identification number),
- d) series and number of ID/passport,
- e) contact details, such as e-mail address or telephone number,
- f) position occupied by You within our organization,
- g) specific identification numbers which are not generally granted (for example employee ID/ access card).

In the case of executing a contract directly between You and the Company, providing the data specified above is voluntary but necessary for the purpose of executing a contract and handling the cooperation between You and the Company. In the event that You do not enter into a contract directly with the Company, providing personal data may be Your official duty.

The consequence of not providing data is the inability of the Company to perform the aforementioned actions (for example, failure to provide data may result in an inability to issue an invoice).

2. Data collected from other sources

We may collect Your personal data from publicly available registers, such as CEIDG (Central Registration and Information on Business) or KRS (National Court Register), in order to verify the information provided by You. The scope of processed data will, in this case, be limited to data available to the public in the relevant registers.

We may also collect Your personal data from the entities in which You are employed or which are represented by You. The scope of processed data will include, in such case, information necessary for the performance of the contract between the Company and such entity, for example, information about termination of Your employment in a given entity, change of contact details or change of the official position occupied by You.

We may also collect Your data from internal databases maintained by entities related to the Company - this applies to data that enables contact with specific Contractors.

3. Legal basis, purposes and periods of data processing

1. Legal basis for data processing

We cannot process personal data if we do not have a valid legal basis. Therefore, we process personal data only when:

- a) processing of data is necessary to fulfill contractual obligations towards You, if You are a party to an agreement concluded with the Company;
- b) processing of data is necessary in order to fulfill our legal obligations, for example, an obligation to issue an invoice or other documents or when it is required by law or explicitly imposed by provisions of law (this applies to the disclosure of data of Contractors at the request of competent authorities or courts), as well as the processing of personal data is necessary to respond to a request or query issued by a public authority;
- c) processing of data is necessary for the realization of the Company's justified interests and does not unduly affect Your interests or fundamental rights and freedoms. Please note that when processing personal data on this basis, we always strive to strike a balance between our justified interests and Your privacy.

Such „justified interests” include:

- i. concluding and performing contracts with Contractors being legal entities without legal personality or with legal persons;
- ii. determining or pursuing by the Company any civil law claims as part of its operations, as well as conducting defense against such claims;
- iii. verifying identity of persons employed in entities employed by or cooperating with the Company, e.g. couriers or persons carrying cash, etc.;
- iv. contacting Contractors, including maintaining internal registers of the Contractors necessary to enable the Company to contact the Contractors.

2. Purposes and periods of data processing

Personal data is processed only for a specific purpose and to the extent necessary to achieve such purpose and for as long as it is necessary. The purposes set out by the Company by processing personal data and the periods during which they are processed are listed below:

Purposes for processing data	Periods of data processing
Fulfillment of contractual obligations	The duration of the contract between the Contractor and the Company
Contacting public authorities	Time period necessary to demonstrate compliance with the obligations imposed by the law on the basis of which the Company makes contact with a public body
Verification of the identity of persons employed in entities cooperating with the Company	The duration of contract between the entity employing the given person and the Company or until the employment of such is terminated
Archiving data on the basis of generally applicable laws, such as the Accounting Act and the Tax Ordinance Act	Period indicated in the relevant regulations; generally 5 years from the end of the calendar year in which, for example, invoicing or contract termination, etc., took place
Marketing activities and activities undertaken for the purpose of sale or conclusion of a reservation agreement	No longer than is necessary for the purposes for which the data is processed

Notwithstanding the above periods, Your data may be processed by the Company for the purpose of determining or pursuing civil law claims by the Company as part of its business, as well as defense against such claims - for appropriate periods of limitation of such claims, generally no longer than for 6 years from the occurrence of the event resulting in such claim.

4. Measures to protect personal data

All employees who will be granted access to personal data, in particular managerial personnel, must comply with internal rules and processes related to the processing of personal data in order to protect them and ensure confidentiality. They are also required to comply with all technical and organizational security measures introduced to protect personal data.

5. The transfer of personal data to recipients and other third parties

Data may be transferred to recipients and other third parties to meet the objectives listed in section 3.2, to the extent that they are necessary for them to perform tasks ordered by the Company, if required by law or if the Company has a different legal basis. The following entities may be deemed to be the recipients or other third parties:

- a) entities related to the Company in person or in capital, subsidiaries of the Company and special purpose vehicles;
- b) entities processing personal data at the request of the Company, such as entities providing archiving services or accounting services.

Such entities do not decide by themselves how to process Your personal data. Personal data are processed by them only to the extent that it is necessary for the Company to run its business. The Company has control over the operation of such entities by means of relevant contractual provisions protecting Your privacy.

- c) all national public administration entities (for example Police), authorities of other EU Member States (for example bodies appointed to protect personal data in other Member States) or courts, if required by applicable national or EU law, or at their request;
- d) courier or postal service providers.

5.1. Transfer of data outside of the European Economic Area

Personal data provided to third parties may also be processed in a country outside of the European Economic Area („**EEA**”), which includes EU Member States, Iceland, Liechtenstein and Norway, as well as OCM Investments LCC, Pacific Investment Management Company LLC and Redefine Properties.

In this respect, an appropriate level of protection was not determined by the European Commission in a way of relevant decision, however, the data will be adequately protected by standard data protection clauses adopted by the European Commission in a way of decision dated 5 February 2010 on standard contractual clauses pertaining transmission of personal data to processors established in third countries under Directive 95/46 / EC of the European Parliament and of the Council (2010/87/ EU).

You are also entitled to ask for additional information in this regard and to obtain a copy of the appropriate security in place, by performing your rights set out in point 6 below.

6. Rights of the Contractors and their performance

6.1. Rights vested with the Contractors

Each person has the right to access their personal data processed by the Company. If You believe that any information about You is incorrect or incomplete, please file a motion to rectify, as described in section 6.2 below. The Company will correct such information without undue delay.

Additionally You are entitled to:

- a) withdraw Your consent in the case the Company has obtained such consent for the processing of personal data (provided that such withdrawal does not violate the processing of data carried out prior to the withdrawal);
- b) request removal of Your personal data in cases provided for in the provisions of the GDPR;
- c) request to limit the processing of your personal data in cases provided for in the provisions of the GDPR;
- d) object - due to reasons attributable to Your particular situation - to the processing of Your personal data (including profiling), if such processing is carried out in order to fulfill the public interest or justified interests of the Company;
- e) transfer the data, i.e. receive personal data provided to the Company in a structured, commonly used and readable machine format, and to request such personal data to be transferred to another controller of personal data, without any hindrance on the part of the Company and subject to its own confidentiality obligations.

The Company will verify Your applications, requests or objections in accordance with the applicable provisions on the protection of personal data. However, remember that these rights are not absolute; relevant provisions provide for exceptions to their application.

In response to Your request, the Company may ask you to verify Your identity or provide information that will help the Company better understand the situation. In the case Your requests are not met, the Company will make every effort to explain its decision to You.

6.2. Performance of your rights

In order to perform the aforementioned rights, please send an e-mail to rodo@r4r.pl or contact the Company by mail at al. Szucha 6, Warsaw 00-582.

If You are not satisfied with the way in which the Company processes Your personal data, please let us know and we will investigate any irregularities that have occurred. Please report Your concerns using the contact details provided above.

If You have reservations about the reaction of the Company, it is also possible to submit a complaint to the competent authority for the protection of personal data. In Poland, the relevant body is the President of the Office for Personal Data Protection.

In order to ensure the up-to-dateness and accuracy of personal data, we may periodically ask You to check and confirm Your personal data stored by us or to inform us about any changes to the personal data (such as change of e-mail address). We encourage You to regularly check the up-to-dateness, correctness, and completeness of the processed personal data.

7. Updates of the information clause

This clause was updated on 24 May 2018 and may be subject to further changes. If it is required by law, all information regarding future changes or additions to the processing of personal data described in this clause that may affect You personally will be communicated to You through the appropriate form of communication usually used by the Company in dealings with Contractors.