

Information on Selected Processing of Personal Data by the Companies of the CPI PG

Below you will find information on the processing of personal data by the companies of CPI PG (the “**CPI PG Companies**”) provided in accordance with the 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 (the “**Regulation**”) and other related laws and regulations governing the protection of personal data. The CPI PG Companies, as personal data controllers, processes personal data as described further in this document.

Processing of Personal Data

The personal data is processed by the CPI PG Companies only to the extent necessary and for the time necessary to achieve a particular purpose.

1.

Purposes of processing

Conclusion and performance of lease agreements

Processing purpose´s description	Keeping records of tenants and contact persons, signing of contracts and maintaining the register of contracts, communicating with tenants and obtaining feedback, maintaining the register of powers of attorney, bookkeeping, invoicing, collecting reports and turnover data, processing bank statements, maintaining the registers of bank guarantees, deposits and insurance contracts, receivables management, received mail records, registration of car registration plates of tenants, keeping records of tenants' training.
Legal basis	The legitimate interest of the parties; or an agreement with the data subject.
Categories of personal data	Contact details, bank details, identification details for signing contracts, registration plates for cars, attendance sheets from training.
Categories of personal data subjects	Employees of tenants, tenants' representatives, employees of CPI PG Companies, employees and representatives of insurance companies and bank guarantees providers.
Source of personal data	The other contracting party.
Categories of personal data recipients	CPI PG Companies, property managers, and other companies providing services related to the particular real estate property.
Duration of personal data storage	For the duration of the lease agreement and subsequently for ten years for the exercise of legal claims.

2.

Purposes of processing

Management and use of the database of existing and future tenants and business partners

Processing purpose 's description	Regular communication with tenants and business partners.
Legal basis	The legitimate interest of CPI PG Companies.
Categories of personal data	Name, surname, phone number (mobile), email, position, company name, postal address.
Categories of personal data subjects	Employees and statutory representatives of tenants/business partners.
Source of personal data	The other contracting party.
Categories of personal data recipients	CPI PG Companies, property managers, and other companies providing services related to the particular real estate property.
Duration of personal data storage (as long as at least one of the following options is valid)	<p>In the case of existing tenants and business partners, for the duration of the contract, and subsequently for a period of ten years.</p> <p>In the case of future tenants, for the duration of the so-called HOT-Lease (preliminary agreement on basic lease conditions), and subsequently for ten years.</p> <p>If consent is granted for the duration of the consent.</p> <p>In other cases (no contract is signed, no consent is given) for the duration of the negotiation of the contract with potential tenants/business partners, and subsequently for one year.</p>

3.

Purposes of processing

Provision of public wi-fi

Processing purpose 's description	Providing Internet access to visitors.
Legal basis	The legitimate interest of CPI PG Companies to operate a public wi-fi network.
Categories of personal data	Identification and technical addresses of the connected device (IP address, MAC address, IMEI, UDID, etc.).

Categories of personal data subjects	Visitors.
Source of personal data	Connected devices.
Categories of personal data recipients	External provider of connection.
Duration of personal data storage	Maximum of 14 days.
<i>Note</i>	<i>This processing is only performed when public wi-fi is provided on the premises.</i>

4.

Purposes of processing

Operation of the CCTV system

Processing purpose 's description	Recording footage from cameras installed for security reasons.
Legal basis	The legitimate interest of CPI PG Companies in the protection of property and human health.
Categories of personal data	Video recordings of people and vehicles in the areas monitored by CCTV.
Categories of personal data subjects	Visitors, employees, and other persons.
Source of personal data	CCTV system.
Categories of personal data recipients	CPI PG Companies, property managers, and other companies providing services related to the particular real estate property.
Duration of personal data storage	Maximum of 14 days.
<i>Note</i>	<i>This processing is only performed when camera systems are used on the premises.</i>

Additional information related to the processing of personal data including, amongst other things, a list of rights in relation to the processing of personal data, the manner in which such data are processed and contact details of the CPI PG Companies' Personal Data Protection Officers are listed in the CPI Privacy Policy located here: <https://cpipg.com/data-protection-policy-en>.