

Data Protection Policy for Leads and Clients

How We Handle Your Data and Your Rights – Information pursuant to Art. 13, 14 and 21, General Data Protection Regulation (GDPR)

By providing the subsequent information, we would like to give you an overview of the way we process your personal data and of your associated rights. Which exact data are processed and in which manner they are used depends definitively on the services requested or agreed, as the case may be. Accordingly, not all of the details provided below may apply to you.

Who is Responsible for the Data Processing and whom can I Contact?

Responsible for collecting your personal data during the acquisition process are:

ACCENTRO GmbH ACCENTRO Real Estate AG

and the respective **property vehicle** within the Accentro Group that is the owner of the subject property, Kantstrasse 44/45
D-10625 Berlin

To meet the contractual requirements of our companies, some of your data are processed collectively; this means all of the companies listed are accountable for the processing (Art. 26, GDPR).

The information on joint controllership pursuant to Art. 26, Sec. 2, Sent. 2, GDPR, is attached to this document as annex.

Our in-house data protection officer may be contacted at this address:

ACCENTRO GmbH
Data Protection Officer
Kantstrasse 44/45
D-10625 Berlin

datenschutz@accentro.de
+49 (0)30 887 181 798

Which Sources and Data do We Use?

We process exclusively personal data that you make available to us within the framework of our mutual business relationship.

In conjunction with the business relations between you and us, we moreover process certain additional data that we require to fulfil our contractual obligations to you. These include specifically:

- Data from correspondence (postal and electronic) between you and us;
- Data from postal, electronic and phone communication.

Why do We Process Your Data (Purposes of Processing) and on What Lawful Bases?

We process personal data in compliance with the provisions of the European General Data Protection Regulation (in Germany: DSGVO) and the Federal Data Protection Act (BDSG):

For the purpose of meeting contractual obligations (Art. 6, Sec. 1, Letter b, GDPR)

The processing of data is done within the framework of initiating a contractual relationship and to meet our contractual obligations to you.

In accordance with statutory requirements (Art. 6, Sec. 1, Letter c, GDPR)

We are subject to various statutory requirements that result in data processing. These include, for instance:

- tax laws as well as accounting regulations
- the German Money Laundering Act (GWG)
- the fulfilment of queries and requirements of supervisory and law enforcement agencies
- the fulfilment of monitoring and reporting requirements under tax law

On top of that, the disclosure of personal data within the framework of administrative/judicial measures for the purposes of gathering evidence, prosecuting crimes or enforcing civil claims.

In conjunction with the balancing of interests (Art. 6, Sec. 1, Letter f, GDPR)

To the extent necessary, we will process your data over and above the actual fulfilment of the contract for the purpose of serving our own legitimate interests or those of third parties. Examples for such cases include:

- the assertion of legal claims and defence in legal disputes
- processing within the CRM system
- accounting purposes

Will My Data be Shared?

Within the Framework of Processing

We employ processors (e.g. IT service providers) to provide our services. The disclosure of your data to them is done in strict compliance with the obligation of confidentiality and the requirements of the GDPR and the Federal Data Protection Act (BDSG).

Other Third Parties

Data are disclosed to recipients outside the company exclusively in compliance with applicable data protection regulations. Recipients of personal data could include e.g.:

- government authorities and institutions (e.g. inland revenue and law enforcement agencies) whenever statutory or administrative requirements apply
- lenders and financial services providers (in conjunction with payment transactions)
- tax consultants, chartered accountants, payroll auditors and tax auditors (statutory audit mandate)

Are Data Transferred to a Third Country or to an International Organisation?

Your data are processed inside the European Union and member states of the European Economic Area (EEA).

How Long will My Data be Stored?

We process and store your personal data as long as doing so is necessary to fulfil our contractual and legal obligations. The data are deleted as soon as they cease to be necessary to fulfil contractual or statutory obligations.

Exceptions apply

- whenever legal hold obligations must be met, e.g. pursuant to the German Commercial Code (HGB) and the Fiscal Code of Germany (AO). The storage or documentation periods set therein generally tend to range from six to ten years;
- to preserve evidence within the framework of laws governing the statute of limitations. Pursuant to Articles 195+, German Civil Code (BGB), the limitation periods can extend up to 30 years, the normal limitation period being three years.
- Other exceptions may apply.

If the data processing is done in our own legitimate interest or that of a third party, the personal data will be deleted as soon as this interest ceases to exist. In this context, the aforementioned exceptions apply.

What are Your Data Protection Rights?

You have the right of access pursuant to Article 15, GDPR, the right to rectification pursuant to Article 16, GDPR, the right to erasure pursuant to Article 17, GDPR, the right to restriction of processing pursuant to Article 18, GDPR, the right to object pursuant to Article 21, GDPR and the right to data portability pursuant to Article 20, GDPR.

The right of access and the right to erasure may be subject to restrictions pursuant to Articles 34 and 35, BDSG.

In addition, there is a right to lodge a complaint with a supervisory authority (Art. 77, GDPR, i.c.w. Art. 19, BDSG). The competent supervisory authority for us is:

Die Berliner Beauftragte für Datenschutz und Informationsfreiheit
Friedrichstrasse 219
D-10969 Berlin

Is there an Obligation to Disclose Data?

Within the framework of the contractual relationship, you must provide the personal data that are required for the initiation, performance and termination of the contractual relationship and for the fulfilment of the associated contractual obligations or which we are legally obliged to collect. Without these data, we will generally not be able to enter into a contract with you or to fulfil it.

To what Extent is the Decision-Making Automated?

We use no fully automated decision-making processes within the meaning of Article 22, GDPR, to set up, fulfil and terminate the contractual relationship. In case we do deploy such processes in individual cases, we will notify you separately of the fact and of your relevant rights if doing so is legally mandated.

Does Profiling Take Place?

We do not process your data with the aim of evaluating certain personal aspects in an automated process.

What Rights to Object do I Have? (Article 21, GDPR)

Individual's Right to Object

You have the right to object at any time to the processing of personal data concerning you on the basis of Article 6, Section 1, Letter f, GDPR (data processing on the basis of a balancing of interests) for reasons arising from your particular situation, including profiling based on this provision within the meaning of Article 4, Number 4, GDPR.

If you file an objection, we will no longer process your personal data unless we can substantiate compelling reasons worthy of protection for processing your data which outweigh your interests, rights and freedoms, or unless the processing serves the assertion, exercise or defence of legal claims.

Where to Submit an Objection

The objection may be submitted without formal requirements, stating "Objection" as subject, providing your name, your address and your date of birth, and being addressed to:

datenschutz@accentro.de
+49 (0)30 887 181 798

Annex 1: Information on Joint Controllership

The property vehicle is a member company of the ACCENTRO group of companies. To enhance efficiency, the Accentro Real Estate AG and Accentro GmbH support the property vehicle in the execution of its tasks. To the extent that ACCENTRO Real Estate AG and ACCENTRO GmbH process personal data, the property vehicle and ACCENTRO Real Estate AG or ACCENTRO GmbH may share data protection obligations in accordance with current data protection legislation.

If so, their joint controllership of the data processing may specifically concern the following purposes:

- the property management within the group-wide CRM system,
- the central controlling,
- the address management, including the entry, storage, display, modification, archiving and deletion of personal data of tenants, prospects and clients

The property vehicle acts as contact point for any issue, comment or suggestion with respect to relevant aspects under data protection law that concern the processing of personal data by the property vehicle in its own right or together with ACCENTRO Real Estate AG or ACCENTRO GmbH as joint controllers within the meaning of data protection legislation. In particular, you may approach the property vehicle to obtain information on the processing of your personal data as well as to exercise your rights in connection with the processing of your personal data.