

INFORMATION MEMORANDUM ON THE PRINCIPLES OF PROCESSING CLIENTS' PERSONAL DATA OF Apartments 4U s.r.o.

(hereinafter the “**INFORMATION MEMORANDUM**”)

The purpose of this INFORMATION MEMORANDUM is to set out the principles for processing personal data of clients (hereinafter the “**Data**”) of Apartments 4U s.r.o., registered office: Bělehradská 858/23, Vinohrady, 120 00 Prague, CIN: 194 14 129 (hereinafter “**Apartments 4U**” or the “**Controller**”), and by its cooperating Partners (hereinafter the “**Partners**”), and to provide Clients with information about what Data Apartments 4U processes about its Clients – natural persons – on the basis of their granted **CONSENT** to the processing of Data (hereinafter the “**Consent**”), namely in connection with the provision of accommodation services and when visiting websites operated by Apartments 4U. We also inform you for what purposes and for how long Apartments 4U processes this Data in accordance with applicable legislation, to whom and for what reasons it may disclose or transfer it, and we further inform you of the rights that natural persons have in connection with the processing of their personal data. At Apartments 4U, strict rules apply determining which employee or cooperating Partner may have access to Data and what Data they may process. As a rule, we do not transfer Data outside Apartments 4U, except where we have Consent, a legal regulation requires or authorises us to do so, or where we have a legitimate interest (for example, in the case of Suppliers or requests from law enforcement authorities, etc.). The Data Protection Officer is Apartments 4U s.r.o., registered office: Bělehradská 858/23, Vinohrady, 120 00 Prague.

This INFORMATION MEMORANDUM explains:

1. What types of Client Data are processed
2. Who may process Client Data
3. What is the legal basis for processing Client Data
4. To what extent and for what purpose Client Data are processed
5. From what sources Client Data are obtained
6. What statutory rights Clients have when their Data are processed
7. With whom Client Data are shared and to whom they are further transferred
8. Where Client Data are stored and how they are secured
9. How Cookies and social media plug-ins are used
10. How long Client Data are retained

1. What types of Client Data are processed?

- The Data that we will process on the basis of the Client's Consent include: Address and contact details – first name and surname, birth number (for sole traders also business name, CIN and registered office), date of birth, contact details,
 - network identifier (IP address), sociodemographic data, information on the use of products and services, information from applications for products and services
 - information from recordings of telephone calls or other communication between the Client and us, banking details, property data,
 - Data that we process to fulfil our legal obligations or for the purposes of our legitimate interests. These are Data we obtain directly from the Client, from public sources (including information from social networks and the internet that you publish about yourself), from surveys and user testing, or from cooperating third parties,
 - Data provided beyond the scope of applicable laws, processed within the Client's granted Consent (processing of photographs, cookies, etc.).
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2. Who may process Client Data?

The Client grants Consent to the processing of their Data to **Apartments s.r.o.**, registered office: Bělehradská 858/23, Vinohrady, 120 00 Prague, CIN: 194 14 129. The Client also grants Consent to persons and entities that cooperate with Apartments 4U on a partnership basis, with the Client granting Consent specifically to:

- the intermediary with whom the Client has arranged the provision of services,
- a Partner selected by Apartments 4U if the Client, when expressing interest in the provision of services, did not contact a specific Partner but contacted Apartments 4U directly, which will select a suitable Partner for the Client who will contact them for the purpose of providing Apartments 4U products or services.

Under the statutory definition, a **Controller** is any entity that determines the purpose and means of processing the Data and collects, processes and stores them for the purpose it has set. Apartments 4U together with its Partners act as **Joint Controllers** of the Client's Data. For the purposes specified in the Consent, they may therefore share and process the Data specified in the Consent. Apartments 4U's Partners may also act as **independent Controllers** of the Data.

3. What is the legal basis for processing Client Data?

The processing of the above Client Data complies with data protection legislation. The basic legal framework for the processing of Data is the **GDPR**, the **Data Protection Act**, the **NSIS Act**, and other related legislation.

The Joint Controllers collect, process and store these Data for a set period because it constitutes compliance with their statutory obligations. These include obligations under laws regulating their field of business, obtaining and evaluating data for the fulfilment of obligations related to anti-money laundering, and a number of other laws concerning sources and origin of income, capital links, nationality, place of residence, subject of activity, political affiliation, etc. On the basis of the Client's Consent, the Joint Controllers may also process this Data for **marketing purposes**.

The Joint Controllers process Clients' Data in accordance with European Union law, in particular **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 (General Data Protection Regulation) (the "**GDPR**").

The Data are collected by the Joint Controllers for the reason referred to in **Article 6(1)(b) GDPR**, i.e. that their processing is necessary for the performance of a contract to which the Client, as the data subject, is party, or to take steps at the Client's request prior to entering into a contract. The Data are provided on a mandatory basis and the purpose of processing such Data is the conclusion and performance of the contractual relationship and related actions (communication with the Client regarding offered services, etc.). The source of the Data is the Client or a person authorised by them. If the Client does not provide the Data, no contract can be concluded with them, no negotiations can be conducted for the purpose of concluding a contract, nor can the service requested by the Client be provided.

A fundamental principle of processing Clients' personal data is that the Joint Controllers process them **fairly, lawfully and transparently** in relation to Clients. The Data must be stored in a form that permits identification of the Client for no longer than is necessary for the purposes for which the Data are processed. The Data must be processed in a manner that ensures appropriate security of the Data, including protection by appropriate technical and organisational measures against unauthorised or unlawful processing and against accidental loss, destruction or damage. The Joint Controllers take measures to provide Clients with all information concerning the acquisition, processing, erasure and security of their Data. The Joint Controllers fulfil these obligations by this INFORMATION MEMORANDUM.

4. To what extent and for what purpose are Client Data processed?

The Joint Controllers process Data only for a defined purpose, to the extent set out below, for the period specified in the concluded contracts or in the relevant legal regulations.

The Joint Controllers process the Data necessary for the performance of the contract concluded between the Joint Controllers and the Client, for the purposes of the business relationship between the Joint Controllers and the Client, as set out in the Consent granted by the Client. The Joint Controllers process the Data on the basis of their **legitimate interests**, as well as the legitimate interests of their Partners. The Joint Controllers also process the Data to analyse and improve the quality of their services and for market analysis and research.

The purposes of processing Client Data, for which the Data are intended under the above legal bases, are:

- performance of contracts and provision of services to the Client
- ensuring the operational activities of the company and its Partners
- accounting and tax purposes
- debt collection
- fulfilment of legal obligations
- direct marketing
- protection of property and persons
- statutory archiving

The purpose of processing the Data also includes the management of the Client Data database maintained by Apartments 4U or its cooperating Partners. The Client's Consent is necessary so that

Apartments 4U and its Partners can provide high-quality and efficient services by using software containing the Client's data. The purpose of processing personal data further includes offering products and services provided by Apartments 4U and its Partners, including via electronic channels, as well as marketing processing, analyses and profiling in order to tailor offers to the Client's needs. This may be a sales or purchase offer related to accommodation services, service communications, satisfaction surveys or birthday greetings. We use a wide range of channels to communicate with Clients – traditional mail, telephone, SMS and e-mail.

We also process our Clients' personal data to support business decisions, to identify business potential and to assess the risk profile of a specific client. The use of the information is preceded by processing consisting in particular of entering the Data into the software database of Apartments 4U and its Partners, subsequently searching for them and using them when providing direct services to the Client. Processing may be either manual or automated.

5. From what sources are Client Data obtained?

The Joint Controllers collect or obtain Data through their websites, forms, applications, electronic or telephone contact, in-person meetings or otherwise. Within the granted Consent, the Data are provided by the Client themselves.

The Joint Controllers also use Data obtained about the Client in the course of their activities, from public sources (for example, public lists and registers, social networks and other public information sources). The Joint Controllers also collect Data, for example by using cookies to find out how the Client uses their websites or applications, or they obtain them from other persons, e.g. from cooperating entities.

6. What statutory rights do Clients have when their Data are processed?

The Joint Controllers process the Data transparently, fairly and in accordance with the GDPR. The Client has the right of access to their Data, to information about the purpose and nature of the processing of the Data and about the recipients of the Data. The Joint Controllers inform the Client about their following rights:

- the right to know the purpose of the Data processing,
- the right to know the types of Data recorded,
- the right to know the recipients of the Data,
- the right to know the period for which the Data will be stored,
- the right to request from the Joint Controllers the rectification or erasure of the Data or restriction of processing and the right to object to such processing,
- the right to all available information about the source of the Data if they are not obtained directly from the Client,
- the right to withdraw Consent to Data processing at any time if the Data are processed on the basis of granted Consent,
- information as to whether automated decision-making, including profiling, takes place
- the right to be informed if the Joint Controllers intend to process the provided Data for a purpose other than that for which they were collected.

If the Client finds that the Joint Controllers are processing their Data in violation of the protection of their private and personal life or in violation of legal regulations, they are entitled to request the

rectification of such defective situation. The Client also has the right, in the event of a breach of the Joint Controllers' obligations, to contact the Office for Personal Data Protection.

The Client has the right not to provide their Data to the Joint Controllers. If the provision of personal data is mandatory (by law or contract), the Joint Controllers will not be able to provide services to the Client. The Client's Consent to the processing of Data is **voluntary**; the Client may refuse to grant it or may withdraw a granted Consent at any time. In the withdrawal of Consent to the processing of Data, the Joint Controllers recommend stating the e-mail and telephone number provided when granting Consent to expedite the request, so they can more quickly locate the specific record in the database of granted Consents in the case of identical names. In the event of withdrawal of Consent, the Joint Controllers will assume that the Client no longer wishes them to continue processing their Data for the purposes for which Consent was given, including any previously granted marketing consents or any specific marketing consents. These additional marketing consents will therefore also be considered withdrawn. The Client may also withdraw Consent only **partially**, and only for **marketing purposes**.

7. With whom are Client Data shared and to whom are they further transferred

The GDPR allows the Joint Controllers to entrust the processing of Data to a third party (a "**Processor**"). A Data Processor is any entity that processes Data on the basis of a special law or on the basis of authorisation or mandate by the Controller.

Processors and recipients of personal data managed by the Joint Controllers are:

- suppliers and service providers of Apartments 4U and its Partners,
- financial institutions and banks,
- state and other authorities within the fulfilment of legal obligations,
- external IT service providers,
- persons providing: – social media monitoring, web analytics and search engines, tools for processing user-generated content,
- advertising, marketing and digital agencies and social media agencies that deliver advertising, marketing services and campaigns, analyse their effectiveness and manage contact with the Client.

Data may only be processed on behalf of the Joint Controllers by **trusted external Processors**. The Joint Controllers provide these Processors only with such information as is necessary for the provision of the service and require that the Data not be used for any other purpose.

The Joint Controllers may transfer Data to **third countries** outside the EU/EEA, e.g. the USA and Switzerland. If Data are transferred to countries outside the EU/EEA or to countries that do not have an adequate level of protection under applicable laws, in particular the GDPR and other EU/EEA and national data protection regulations, such transfer will take place on the basis of an exception applicable to the specific situation, or the Joint Controllers will ensure that **appropriate safeguards** are provided to ensure the protection of personal data in accordance with the GDPR, in particular Article 42(2) GDPR. The Joint Controllers **do not offer or sell** the Data.

8. Where are Client Data stored and how are they secured

The Joint Controllers make every effort to properly protect the Client's Data from the moment of their acquisition until the moment of their deletion. The Joint Controllers store and process the Data secured

in accordance with industry standards and have adopted appropriate security measures through diligently set internal processes to prevent misuse of the Data or unauthorised access to the Data. The Joint Controllers have ensured that every authorised and trusted Processor handles the Data properly, securely and in the same manner. The Joint Controllers have valid **Data Processing Agreements** with all Processors.

The Data that the Joint Controllers collect about the Client are stored and processed only in the **European Union (EU)** and the **European Economic Area (EEA)** or in countries that have undertaken to comply with EU standards for the processing and security of personal data (USA). Outside the EU, personal data are processed or stored only with Processors certified under the **EU–U.S. Privacy Shield** – namely Google LLC, Dropbox, Inc., and Microsoft.

When processing the Data through their own employees, the Joint Controllers may entrust this activity to selected employees who will be instructed about their duty to maintain confidentiality regarding the Data and about other obligations they must comply with so as not to violate statutory provisions. The Joint Controllers use appropriate technical equipment and software in a manner that excludes unauthorised or accidental access to the Data by persons other than the employees of the Joint Controllers or contractually engaged Processors.

The Joint Controllers store Data in paper form in duly secured facilities and premises. In electronic form, the Data are stored on secured servers without access by external entities or are stored on data carriers that can be accessed only by authorised persons, according to their assigned permissions. The Joint Controllers regularly test, assess and evaluate the effectiveness of the technical and organisational measures introduced to ensure the security of Data processing. They regularly provide training to authorised persons working with Client Data.

9. How Cookies and social media plug-ins are used

In providing their services and the services of their Partners and to improve their websites, Apartments 4U uses so-called **Cookies**, which are stored via the web browser used and allow the websites to be better customised and their content enhanced. Cookies allow information to be obtained, such as visit information or other settings. By using the Apartments 4U websites, the Client agrees to the storage of Cookies. The information provided by these Cookies is anonymous and helps to understand how Clients use the websites so that the presentation of their content can be improved. These services are generally provided by independent measurement and research companies, so in the case of these Cookies they may be **third-party cookies**.

The use of cookies can be limited or completely blocked in the web browser settings. Information on the settings of a specific browser can be found at:

- Internet Explorer: windows.microsoft.com
- Google Chrome: support.google.com
- Mozilla Firefox: support.mozilla.org
- Opera: help.opera.com
- Safari: support.apple.com

More information about cookies can be found here:

<https://www.google.cz/intl/cs/policies/technologies/cookies>

Apartments 4U websites also use Cookies for **targeted advertising**, which allows us to tailor advertising and ensure it is relevant for the Client, based on the areas viewed on the company's websites and the geographic location of the Client's IP address. These Cookies are placed by third-party advertising networks with our consent. If the Client uses our partners' websites, a Cookie may be set by the visited websites. We do not operate these sites and therefore have no control over the dissemination of these Cookies. More information about these Cookies can be found on the websites of the respective third parties, such as Facebook, Inc.; Google LLC; Seznam.cz, a.s.

Information collected by third parties through Cookies is usually processed by a data centre closest to the origin of the transmission. This means that such information, including advertising transmissions, may be processed on servers located in the EU and EEA and transferred outside the EU and EEA.

10. How long are Client Data retained?

The Joint Controllers process the Data for the duration of the Client's granted Consent or for the duration of the contractual relationship (i.e. for the period during which Apartments 4U and its cooperating Partners provide the service) and subsequently for a further **10 years**, unless the Client's Consent to the processing of Data is withdrawn. However, withdrawal of Consent does not affect the processing of the Client's Data to the necessary extent for the fulfilment of obligations arising from generally binding legal regulations (e.g. Act No. 326/1999 Coll., on the Residence of Foreign Nationals in the Territory of the Czech Republic; Act No. 253/2008 Coll., on Certain Measures against the Legalisation of Proceeds of Crime and Terrorist Financing, etc.), nor the processing of the Client's Data for the exercise of the **legitimate rights** of the Joint Controllers (and the legitimate rights of Processors – especially for tax and accounting purposes), nor the processing of the Client's Data necessary for the purposes of the **legitimate interests** of the Joint Controllers or the Processors. Some Data may be retained by the Joint Controllers for **statistical** purposes or for **historical** record-keeping.

If no contractual relationship between the Client and Apartments 4U, or its cooperating Partners, is subsequently established after the granting of Consent, the Client's Consent is valid for **1 year** from its granting. After the expiry and termination of the Consent, the Data are deleted or processed only to the extent and for the purposes for which Consent is not required under legal regulations.

If the purpose of storing the Data has been fulfilled and the storage period has elapsed, the Data are deleted from the systems and records of the Joint Controllers or **anonymised** so that the Client can no longer be identified. Data that have been anonymised may be further processed by the Joint Controllers without further notice to the Client.

Upon termination of the processing of the Client's Data, the Joint Controllers ensure the **physical destruction** of the Data.

These Client Data Processing Principles are effective as of **1 August 2025**.