

ANNEX – Scope of data processing

1. Data of clients, business partners, service providers and other third persons

Purpose	Categories	Ground	Period
Provision of real estate brokerage services for clients (<i>providing services to clients, including taking necessary steps before entering into a contract, fulfilling contractual commitments, and managing ongoing contractual relationships</i>)	Personal identity data (name, surname) Contact details (address, telephone number, e-mail address) Property-related data (public registry information, cadastral data, relevant property detail, photos, visualisations, planning of the property) Data about transaction parties (identity details of involved parties, including spouses, children, if required for contract preparation) Financial information (bank account number, transaction records related to property transactions) Transactional details (service history, payment information) Other data submitted by a client	<i>Contract</i> (for the performance of contract or in order to take steps required prior entering into contract) <i>Legitimate interest</i> (in cases where data from public registers on real estate owned by third parties is processed, when this is necessary for the proper provision of services and based on the assessment of justified interest carried out by the Agency)	Duration of contract + 5 years

Purpose	Categories	Ground	Period
Maintaining business relationships with business partners and service providers (<i>managing contractual relationships with service providers and business partners, including taking necessary steps before entering into a contract, fulfilling contractual commitments, and managing ongoing business relationships</i>)	Personal identity data (name, surname for natural persons; title and code for legal entities) Contact details (address, telephone number, e-mail address) Transactional details (service history, payment information, bank account number) Information on representatives (job titles, names, contact details) Other data submitted by a service provider or business partner	<i>Contract</i> (for the performance of contract or in order to take steps required prior entering into contract)	Duration of contract + 5 years
Compliance with anti-money laundering (AML), counter-terrorist financing (CTF) and international sanctions obligations (<i>including client identity verification, risk assessment, transaction monitoring, and reporting to competent authorities</i>)	Know-Your-Client (KYC) data (identification documents data, date and place of birth, nationality, tax identification number, proof of address, photographic data, occupation and employer details, source of funds or wealth, risk assessment data including PEP status and sanction screening results, and other data that is mandatory according to applicable legal acts) Personal identity data (name, surname) Contact details (address, telephone number, e-mail address)	<i>Legal obligation</i> (in relation to anti-money laundering, counter terrorist financing and sanctions compliance)	Duration of contract + 8 years

Purpose	Categories	Ground	Period
Administration of requests made by third persons (regarding advertised properties and other matters) <i>(responding to inquiries submitted via our website, social media accounts, communicating via email, phone, etc.)</i>	Personal identity data (name, surname) Contact details (telephone number, e-mail address) Details provided in the inquiry and consultation provided by us (questions, preferences, feedback) Communication logs	<i>Consent</i> (given by data subjects by actively submitting inquiry for the Agency and providing their data)	Up to 1 year after the last correspondence
Direct marketing <i>(providing advertisements and promotional content, informing about our services and offers, collecting opinions on services through surveys, etc.)</i>	Personal identity data (name, surname) Contact details (phone number and other contact information provided by the data subject) Marketing preferences (opt-in/opt-out status, preferred communication channel) Interaction history (email open rates, clicks on promotional content)	<i>Contract</i> (for providing information on our services to existing clients) <i>Consent</i> (data subject has given prior consent to his/her data processing for direct marketing activities)	Until opt-out
Cookies management <i>(understanding how users interact with our online services with a purpose to enhance and optimize their experience, and to develop new content)</i>	Technical data (IP address, access date and time, device information, internet provider details, geo-location data, language preferences) Behavioural data (browsing behaviour, pages visited, time spent on the website)	<i>Consent</i> (for non-essential cookies) <i>Legitimate interest</i> (for essential cookies ensuring website functionality)	Depends on cookies type, specified in the Cookies Policy

Purpose	Categories	Ground	Period
Defending our legal rights and legitimate interests (<i>in the event of legal claims</i>)	All of personal data the Agency possesses that are necessary to defend our legal rights and legitimate interest in case of legal claims	<i>Legal obligation</i> (processing is necessary for compliance with a legal obligation to which we are subject) <i>Legitimate interest</i> (only in cases where assessment of necessity to process data on such ground has been prepared)	As required by law

2. Data of job applicants

Purpose	Categories	Ground	Period
Collecting general information about job applicant, details of assessment	Personal identity data (name, surname, date of birth) Contact details (address, telephone number, e-mail address) Details on work and professional experience (employment, employment period, job title/position, responsibilities, and achievements) Details on education (educational institution, training period, completed education and acquired qualification)	<i>Contract</i> (processing necessary before entering into contract) <i>Consent</i> (consent is expressed by applying to the position at the Agency)	Up to 1 year if application is unsuccessful If application, your (as employee's) data is processed further in accordance with our internal procedures

	Information on further periodic training (training courses attended, certificates obtained) Details on knowledge of languages Information technology skills Other competences and information provided in CV, cover letter, letter of motivation or other application documentation Summary of an interview with job applicant Insights and opinions of persons carrying out the recruitment selection		
Collecting references about job applicants	Feedback from a person recommending a job applicant Contact information/details of such person	<i>Consent</i> (specifically expressed consent)	
Collecting information that may be requested at the final stage of selection/recruitment process	Identification documents data (ID card, passport data, etc.) Data on health (only to extend of applicable laws)	<i>Legal obligation</i> (processing is necessary for compliance with a legal obligation to which the Agency is subject)	