

Last updated on: 05/2026

# STATEMENT ON THE PROTECTION AND PROCESSING OF PERSONAL DATA OF DATA SUBJECTS OUTSIDE VYDRICA

## ***What is the purpose and scope of this document?***

The purpose of this privacy statement is to inform you about how Vydrica and its subsidiaries (**Vydrica**, “**we**”, “**us**” or “**our**”) process your personal data when you communicate with us. This privacy statement is intended for **persons other than** Vydrica **employees** and job applicants.

For the purposes of this privacy statement, the terms “individuals”, “you” or “your” refer collectively or individually to:

- Persons who visit Vydrica’s premises, points of sale or websites, or who attend events organised by Vydrica (visitors and guests),
- Persons involved in the provision of services to Vydrica (suppliers),
- Clients and/or individuals interested in Vydrica’s products and services (potential clients),
- Persons involved in the process of reporting unfair practices,
- Individuals who otherwise cooperate with Vydrica without a formal contractual relationship (third parties).

## ***Who is responsible for processing your personal data?***

For the purposes of this privacy statement and unless otherwise stated, VYDRICA DEVELOPMENT, a.s., with its registered office at Legionárska 10, 811 07 Bratislava – Staré Mesto district, Company ID No.: 51 733 064, is the controller of the processing operations described in this document.

Depending on the circumstances, and where expressly stated in this or another specific privacy notice, the following Vydrica companies may act as data controllers:

- Vydrica Development V1+V2, s.r.o., with its registered office at Legionárska 10, 811 07 Bratislava – Staré Mesto district, Company ID No.: 52 215 296,
- Vydrica Development V3, s. r. o., with its registered office at Legionárska 10, 811 07 Bratislava – Staré Mesto, Company ID No.: 52 215 229,

- Vydrlica Development Retail, s.r.o., with its registered office at Legionárska 10, 811 07 Bratislava – Staré Mesto, Company ID No.: 52 214 818,
- Vydrlica Development Parking, s. r. o., with its registered office at Legionárska 10, 811 07 Bratislava - Staré Mesto, Company ID No.: 52 215 091,

On 14 October 2025, a change in shareholders occurred at Vydrlica Development V4, s. r. o., with its registered office at Legionárska 10, 811 07 Bratislava - Staré Mesto, Company ID No.: 52 213 943, a change in shareholders took place, as a result of which this company ceased to be part of the Vydrlica Group and is now part of the Lucron Group. Further information on data protection for Vydrlica Development V4, s. r. o. is available on the website <https://lucron.sk/v> under the Privacy Policy section.

We monitor the methods used to collect your personal data and the purposes for which it is processed. If you have any questions, queries or requests regarding personal data protection, please contact us at [privacy@vydrlica.com](mailto:privacy@vydrlica.com).

### ***What personal data do we process?***

The personal data referred to in this privacy statement is processed by various departments within Vydrlica for various purposes, with the aim of managing your interactions with the company.

We always process your personal data for a specific purpose and only process the personal data that is relevant to achieving that purpose. We usually obtain this data directly from you; however, we may sometimes obtain your personal data from third parties (e.g. from social media when you follow our project). Personal data may be processed by various departments of Vydrlica and/or project companies, depending on your connection with these companies.

A more detailed description of how we process your personal data can be found below:

### **If you are a visitor to Vydrlica’s premises/sales outlets or are attending events organised by Vydrlica (visitors and guests)**

Vydrlica’s responsible function	Why do we process your personal data?	What personal data do we process?
<b>Marketing/sales</b>	Organising events, managing your participation in events and promoting these events in various media.	Video recordings, photographs (including digital photographs and video recordings), attendance details (name, company email address), professional role, meal preferences for small events

<b>Office</b>	Ensuring the safe and secure use of office premises and other properties	Name, contact details, professional role, vehicle registration number if vehicles are used, CCTV footage
<b>Marketing</b>	To send direct marketing messages (newsletters), to respond to your questions, requests and enquiries when you contact us via the contact form on the website or by email, and to monitor your behaviour and activity on our website.	Through the contact form on our website, we may process your first name and surname, email address and telephone number, and, where applicable, your message.  We also process your personal data obtained via cookies on our website. You can find more information about these specific practices in our cookie policy on our website.

For the purposes of ensuring security in office premises/sales outlets and other properties, the data controller is the relevant Vydrica project company in the case of the sale of a specific project, and VYDRICA DEVELOPMENT, a.s. in all other cases.

For other processing activities described in this section, the data controller is VYDRICA DEVELOPMENT, a.s.

### **If you are involved in the provision of Vydrica's services or products (suppliers and other contractual partners)**

<b>Vydrica's responsible function</b>	<b>Why do we process your personal data?</b>	<b>What personal data do we process?</b>
<b>Office</b>	Ensuring the safe and secure use of office premises and other properties Receiving and sending post (including standard parcels, as well as receiving post from bailiffs)	Name, contact details, professional role, vehicle registration number (if vehicles are used), CCTV footage
<b>Legal aspects</b>	for the purposes of managing your contract(s) with us and in the event of disputes or legal proceedings	names, contact details, professional roles, conduct and any other data arising from claims
<b>Accounting</b>	Carrying out accounting-related activities, such as issuing invoices for services and/or products we have purchased from you as our supplier.	Identification details, contact details, bank account details, credit card number, compensation, agreements and contracts

**If you are a client or a potential future client of Vydrica**

Vydrica's data controller	Why do we process your personal data?	What personal data do we process?
<b>Marketing</b>	If you have expressed an interest in any of our offers, we may process your data for marketing purposes (e.g. to provide you with further information about the offer or to send you our newsletter).	First name, surname, email address, other contact details
<b>Accounting</b>	Carrying out accounting-related activities, such as issuing invoices for services and/or products you have purchased from us.	Identification details, contact details, bank account details, credit card number, compensation, agreements and contracts
<b>Sales</b>	For the purposes of pre-sale, sale, rental, contractual and after-sales services that we offer to you as one of our clients in the residential property sector.	Names, nationality, personal identification details (date of birth, national ID number, ID card number, contact details, employer and job title, family composition, financial information, contracts and agreements, signature, information regarding identity documents
<b>Commercial</b>	For the purposes of pre-sales, sales, contractual and after-sales services that we offer to you as one of our clients.	Names, contact details, job title, signature, information on identity documents, information on authorisation (power of attorney)
<b>Legal</b>	In the event of a dispute or conflict between Vydrica and you, for the purposes of managing or resolving such a dispute or conflict	names, contact details, job title, conduct and any other data arising from the allegations
<b>Legal services/sales</b>	Implementation of compliance procedures for the purposes of combating fraud and violations of clients' rights (e.g. AML KYC).	Personal identification data, nationality, role, contact details, financial data (source and nature of income), identity document information, signature
<b>Sale</b>	For the purpose of letting property that you own as a property owner	Names, nationality, personal identification data (date of birth, personal identification number, contact details, financial information,

		agreements and contracts, signature, information on identity documents
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In the case of the processing activities listed in the table above, the controller will be the party with whom you have entered into a contract or taken steps to enter into one.

### **Procedure for reporting unfair practices**

Responsible function at Vydrica	Why do we process your personal data?	What personal data do we process?
<b>Human Resources Department</b>	If you are a whistleblower, a person involved in collecting or processing reports from whistleblowers, or a person to whom a whistleblower's report relates, we may process your personal data as part of our reporting procedure.	Name, contact details, behaviour and any other data that may be derived from the report.

For the purposes of this processing activity, the data controller will be VYDRICA DEVELOPMENT, a.s.

### **If you cooperate with Vydrica without a contractual relationship (other third parties)**

Responsible function at Vydrica	Why do we process your personal data?	What personal data do we process?
<b>Legal aspects</b>	In the event of a dispute or conflict between Vydrica and Vydrica's contractual partners that concerns you as a third party	names, contact details, job title, conduct and any other data arising from the allegations

If you are a client, for the purposes of this processing activity, the controller of your personal data will be the company with which you have entered into a contract or taken steps to enter into one. In all other cases, the controller will be VYDRICA DEVELOPMENT, a.s.

### **Processing activities not covered by this privacy statement**

There may be processing activities involving the processing of data subjects' personal data outside Vydrlica, which are described in detail in separate privacy statements.

Any information regarding how we process your personal data relating to:

- The use of cookies on our website – please see our cookie policy, which can be found at the bottom of the website <https://vydrlica.com>

### ***We process your personal data for the following purposes:***

#### **a) Necessary for the performance of a contract**

In certain cases, the processing of your personal data is necessary for the performance of a contract to which you are a party, or to take steps at your request prior to entering into a contract. Specifically, this applies when we are considering entering into a contract with you for the sale or letting of property.

#### **b) Consent**

In very limited cases, we process your personal data on the basis of your explicit consent. Specifically, this applies when:

- You contact us via our website to obtain more information about our offers, or
- you request to receive our newsletter, or
- we ask for your consent to collect certain information regarding your dietary preferences in connection with your participation in an event organised by Vydrlica, or
- we ask for your consent to take photographs or record videos during an event organised by Vydrlica.

Whenever we process your personal data on the basis of your consent, you have the right to withdraw your consent at any time and without any detriment by contacting Vydrlica at this address ([privacy@vydrlica.com](mailto:privacy@vydrlica.com)). In your email, you should clearly provide sufficient details to enable us to identify you, and clearly state the purpose for which your consent was originally obtained.

If your consent has been withdrawn, the processing activities based on it will be stopped as soon as possible. However, the withdrawal of your consent does not affect the lawfulness of the processing activities on which the consent was based prior to its withdrawal. All data processing operations that were based on consent and took place prior to its withdrawal remain lawful.

#### **c) Compliance with the data controller's legal obligations**

In certain cases, the processing of your personal data is necessary to comply with a legal obligation to which Vydrlica is subject. Specifically, this applies in cases where:

- We collect information as part of the process of reporting unfair practices,
- We collect information about you as a client or potential client in order to fulfil our obligations under anti-money laundering legislation and the Civil Code relating to the finalisation of a contract,
- We use your personal data to fulfil our obligations under commercial law, tax and accounting legislation.

**d) The controller’s legitimate interest**

Most of our personal data processing activities are necessary for our legitimate interests and the legitimate interests of third parties. In all such cases, we ensure that the processing is proportionate to the purpose specified by Vydrica and does not override your interests or fundamental rights and freedoms.

***How long do we retain your data (retention period)?***

Under no circumstances will personal data be retained for longer than is necessary to fulfil its purpose.

In general, we will retain personal data for the duration of your relationship with Vydrica. Certain categories of personal data are retained for a relatively shorter period; for example, data contained in CCTV recordings are retained for 72 hours from the time the recording is made, unless an incident occurs (in which case the retention period will be determined by the relevant authority conducting the investigation). Certain other categories may be retained for longer if required by law (e.g. we may retain some of your personal data for 10 years in accordance with the retention period defined by anti-money laundering legislation).

Below you will find a table providing further information on how long Vydrica retains your personal data.

For further information, please contact us at the following email address: [privacy@vydrica.com](mailto:privacy@vydrica.com).

Processing activities	Personal data we process about you	Retention period
Online and social media promotion, promotion of new projects and products, general customer information, public relations activities, newsletters (external and internal)	First name, surname, email address, other contact details, photographs, videos	<p>We retain your personal data relating to some of our projects and your communications via the contact form on our website for 5 years.</p> <p>When you decide to unsubscribe from our newsletter, we will immediately delete your personal data processed for this purpose.</p>

		Vydrica retains the contact details and postal addresses of visitors (and any other persons who contact the company) for a maximum of 4 years, unless they are required as evidence to defend claims.
Website content management, management of communication via website forms, use of cookies	Electronic identification data (IP address, cookies, time of connection, browsing session information, etc.) via contact forms (first name and surname, email address, telephone number and message – optional)	Personal data stored on our web server is retained for 2 years
CCTV footage	Name, contact details, job title Vehicle registration numbers, where vehicles are used; CCTV footage (for security purposes in offices, at Vydrica sales outlets and on construction sites)	Up to 72 hours for construction sites and sales outlets, unless an accident occurs. In such cases, the retention period will be determined by the relevant authority conducting the investigation
Accounting – invoicing, supplier management, management of received orders and their payment, searching for potential suppliers and their evaluation, financial accounting	Names, contact details, job title, Bank account details, credit card number Compensation, agreements and contracts	Accounting documents are retained for 10 years following the year to which they relate.  Tax documents are retained for 10 years following the year to which they relate, but for no shorter period than the time limit during which the right to assess tax or a tax difference expires.
Pre-sale, sale, letting, contract management, after-sales services for clients in the residential property sector	Names, nationality, personal identification data (date of birth, personal identification number, ID card number), contact details, employer and job position, family composition, financial information, agreements and contracts, signature, information on identity documents	Purchase contracts and documentation relating to financial compensation are retained for 10 years.  Data from other contracts with customers and business partners are retained for a maximum of 4 years after the contract ends.

		Contact details and correspondence addresses of potential clients (and any other persons who contact the company) are also retained for a maximum of 4 years, unless required as evidence to defend claims.
Dispute Resolution, Legal Proceedings, Debt Management	names, contact details, job title, conduct and any other data arising from the allegations	In the event of a potential dispute, the relevant documents are retained for 3 years from the date the claim arose, in the case of claims by natural persons, and for 4 years from the date the claim arose, in the case of claims by businesses. In the event of an ongoing dispute, such documents and the personal data they contain are retained for the duration of the dispute.  In the event of enforcement during enforcement proceedings and for a further 10 years from the date the judgment becomes final
Implementation of compliance procedures for potential clients and clients for the purposes of combating fraud and breaches of customer rules (e.g. AML KYC).	Personal identification data, nationality, position, contact details, financial data (source of income), information on identity documents, signature	Vydrica retains AML information on clients for 5 years

### ***Who do we share your personal data with?***

Your personal data may be shared with both internal and external parties of Vydrica.

<p><b>Within Vydrica</b></p>	<p>The recipients of your personal data are usually Vydrica employees. They may also include temporary staff, independent contractors, interns or consultants working for Vydrica. If you wish to know how departments process your personal data, please refer to the previous sections of this privacy statement.</p> <p>We may also provide your personal data to other companies within the group (listed in the section “Who is responsible for processing your personal data?”) for purposes related to the management of the company’s operations.</p>
<p><b>Outside Vydrica</b></p>	<p>In certain circumstances, Vydrica may share your data with third parties. In such cases, your data will be shared with:</p> <ul style="list-style-type: none"> <li>- Statutory bodies</li> <li>- IT service providers</li> <li>- Social media platforms</li> <li>- External photography and video suppliers</li> <li>- Digital agencies</li> <li>- Website maintenance providers</li> <li>- Event management companies</li> <li>- CCTV system providers</li> <li>- Financial and accounting software providers</li> <li>- Financial brokers</li> <li>- Solicitors</li> <li>- Providers of utility services for rented flats</li> <li>- Dispute resolution bodies</li> <li>- Solicitors</li> <li>- Advisors</li> <li>- Registered auditors</li> </ul> <p>Further information about the service providers used by Vydrica can be found at: <a href="mailto:privacy@vydrica.com">privacy@vydrica.com</a>.</p> <p>Some of your personal data may be disclosed with your consent.</p>

Vydrica further ensures that third-party service providers who process data on behalf of Vydrica have put in place appropriate contractual safeguards to protect your personal data.

Please note that we may use or disclose your personal data if required to do so by law, or if we reasonably believe that such use or disclosure is necessary to protect our rights and/or to comply with judicial or regulatory proceedings or other legal processes.

### ***When does the international transfer of personal data take place?***

Your personal data is primarily processed within the European Economic Area or in jurisdictions that provide an adequate level of protection, and may be transferred outside the European Economic Area to a limited extent.

If your personal data is transferred outside the European Economic Area, you will be informed of this in the relevant privacy notices. We will also take steps to ensure appropriate safeguards are in place to protect such data. Appropriate safeguards may include a data transfer agreement with the data recipient based on the European Commission's Standard Contractual Clauses (SCCs) or other suitable mechanisms.

For the purposes set out in this privacy notice, your personal data may be transferred to third countries where we use service providers based outside the European Economic Area.

For further details regarding the transfers described above and the appropriate security measures used in connection with such transfers, please contact [privacy@vydrlica.com](mailto:privacy@vydrlica.com).

### ***What are your rights?***

As an individual, you have various rights which you may exercise in certain circumstances in relation to your personal data held by us. You have the right to access, rectify, erase or restrict the processing of personal data concerning you.

- **Your right of access** – you have the right to ask us for copies of your personal data.
- **Your right to rectification** – you have the right to ask us to correct any personal data you believe to be inaccurate. You also have the right to ask us to complete any information you believe to be incomplete.
- **Your right to erasure** – in certain circumstances, you have the right to ask us to erase your personal data.
- **Your right to restriction of processing** – in certain circumstances, you have the right to ask us to restrict the processing of your personal data.
- **Your right to data portability** – you have the right to receive the personal data concerning you that you have provided to us in a structured, commonly used and machine-readable format, and you have the right to transmit this data to another controller where the processing is based on your consent and is carried out by automated means.

- **Your right to object to the processing of your personal data** – You have the right to object at any time to the processing of your personal data where it is based on our legitimate interests or those of a third party; in particular, you may object to the processing of your personal data for direct marketing purposes.
- **Your right not to be subject to automated individual decision-making, including profiling** – You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you.

If you wish to make a request, please contact us at [privacy@vydrice.com](mailto:privacy@vydrice.com). You do not have to pay any fees to exercise your rights. If you make a request, we will make every effort to respond to you within a reasonable timeframe.

You also have the right to lodge a complaint with the Slovak supervisory authority. You can contact them at:

Office for Personal Data Protection of the Slovak Republic

Námestie 1. mája

811 06 Bratislava

Slovak Republic

Email address: [statny.dozor@pdp.gov.sk](mailto:statny.dozor@pdp.gov.sk)

### ***How do we protect your personal data?***

Vydrice takes all reasonable steps to ensure that appropriate security measures are in place to protect the confidentiality and integrity of your personal data.

### ***Who can you contact to exercise your rights?***

If you have any questions or concerns regarding this privacy statement, please do not hesitate to contact us at [privacy@vydrice.com](mailto:privacy@vydrice.com) or send your request to the following address: Legionárska 10, Bratislava - Staré Mesto 811 07.