

## PRIVACY POLICY

Welcome to this Website.

We respect your privacy and are committed to protecting your personal information.

This Privacy Policy describes how your data is collected, used, stored, and protected when you browse this Website or contact the Agency through it.

By using this Website, you agree to the practices described in this Privacy Policy.

If you do not agree with this Policy, please stop using the Website.

### DEFINITIONS

For the purposes of this Privacy Policy, we use the following terms as defined by the General Data Protection Regulation (GDPR):

1) *Personal data* - any information relating to an identified or identifiable natural person (“data subject”), such as name, email, identification number, location data, or online identifier.

2) *Processing* – any operation or set of operations performed on personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation, retrieval, consultation, use, disclosure, restriction, erasure, or destruction.

3) *Data controller* - the natural or legal person that determines the purposes and methods of processing personal data. For the purposes of this Privacy Policy, the Data Controller is the real estate agency or professional that operates this Website.

### COLLECTION OF INFORMATION

#### 1) *Contact information:*

If you fill out a contact form, we collect the information you provide, including your name, email address, phone number and any additional comments. This data is used to respond to your inquiries or provide requested information.

#### 2) *Cookies:*

We use some or all of the following types of cookie:

*Session Cookies:* These are temporary cookies that are deleted when you close your browser. They help with navigation and enhance the functionality of the website during your visit.

*Persistent Cookies:* These cookies remain on your device for a longer period or until you manually delete them. They enable us to remember your preferences, making your future visits more convenient and personalized.

*Analytical Cookies:* We use these cookies to gather data on how visitors interact with our website. This helps us understand traffic patterns and user behavior, which in turn allows us to improve our services and enhance your browsing experience.

Non-essential cookies (such as analytical cookies) are only used after obtaining your explicit consent via our cookie banner or preference center. You can manage your cookie preferences at any time.

For full details, please refer to our Cookie Policy.

#### 3) *Communication Records:*

If you contact the Agency using the phone number, email, or messaging links provided on the Website, the Agency may retain your contact details and the fact of communication in order to continue providing assistance or support.

The Agency does not record or store the content of conversations unless required by law.

## LEGAL BASIS AND PURPOSES OF PROCESSING

We process your personal data only where a valid legal basis under the General Data Protection Regulation (GDPR) applies. Specifically:

1) *Inquiry and Communication Data* (name, email, phone number, inquiry details). Processed to respond to your request, provide information about properties, and maintain communication.

Legal Basis: Performance of a contract or pre-contractual steps at your request (Art. 6(1)(b) GDPR).

2) *Customer Support and Follow-Up* (email correspondence, call-back requests). Processed to provide assistance, clarify property-related information, or continue communication where appropriate.

Legal Basis: Legitimate interest in providing efficient and professional customer service (Art. 6(1)(f) GDPR).

3) *Analytics and Cookies* (device data, browsing behavior, usage statistics). Processed to analyze Website performance, understand visitor interactions, and improve content structure.

Legal Basis: Explicit consent (Art. 6(1)(a) GDPR).

Non-essential cookies are used only after you grant consent. Consent may be withdrawn at any time.

4) *Security and Fraud Prevention* (IP address, system logs, connection metadata). Processed to maintain Website security, prevent abuse, and ensure reliable functioning of the Website.

Legal Basis: Legitimate interest in ensuring the security and integrity of the Website (Art. 6(1)(f) GDPR).

## SHARING OF DATA

We do not sell or trade your personal data. Your information is only shared in the limited cases described below, and always in accordance with applicable data protection laws.

1) *Agency Representatives*. Your contact details and inquiry information may be accessed by authorized representatives of the Agency for the sole purpose of responding to your request, providing property information, or continuing communication at your direction.

2) *Service Providers (Data Processors)*. We may share your data with carefully selected third-party providers who support the operation of this Website, such as:

- web hosting and website infrastructure services,
- email delivery and communication tools,
- optional analytics tools (used only with your consent).

These providers may process your data only on our behalf, only for the purposes described in this Privacy Policy, and are bound by confidentiality and data protection obligations.

3) *Legal and Regulatory Requirements*. We may disclose your information if required to do so by law, or in response to a valid request from law enforcement, courts, or regulatory authorities.

## HOW LONG WE KEEP YOUR DATA

We retain personal data only for as long as it is necessary to fulfill the purposes described in this Privacy Policy, or for as long as required by applicable legal, regulatory, or professional obligations in the country where the Agency operates.

Retention periods depend on the nature of the data and the context of your interaction:

1) *Contact Form and Inquiry Data*. We retain the personal information you submit (such as your name, phone number, email address, and message content) only for as long as necessary to respond to your request and, where applicable, to continue communication at your direction.

2) *E-mail Correspondence*. If communication continues (for example, to arrange a viewing or discuss property details), your messages may be stored as part of normal business correspondence. You may request deletion at any time, unless we are legally required to retain the information.

3) *Cookies and Browsing Data*. Cookies are stored based on their type:

- Session cookies are deleted when you close your browser.
- Persistent and analytics cookies are retained only for the period specified in your cookie settings and can be removed or disabled at any time through your browser preferences.

For more details, please refer to the Cookie Policy.

4) *Legal or Regulatory Requirements*. We may retain certain data longer if required to comply with applicable legal obligations or to resolve potential disputes (for example, proving that we responded to a request lawfully).

### Periodic Review & Disposal

We conduct regular reviews of all stored personal data. Where retention is no longer necessary for the original purpose and no legal basis for further storage exists, we will either:

- securely delete the data, or
- anonymize it to prevent any further identification of the individual.

## YOUR PRIVACY RIGHTS

As a User, you have the following rights:

1) *Right to Access*. You may request confirmation of whether we process your personal data and obtain a copy of the data we hold about you.

2) *Right to Correction*. If any personal data we hold is inaccurate or incomplete, you may request that it be corrected or updated.

3) *Right to Deletion*. You may request the deletion of your personal data.

This right may be limited where data must be retained to comply with legal obligations or to resolve potential disputes.

4) *Right to Restrict Processing*. You may request that we limit the processing of your personal data in certain circumstances (for example, while a correction is being evaluated).

5) *Right to Object*. You may object to the processing of your personal data where it is based on legitimate interest or similar grounds.

Your privacy rights may vary depending on your location and applicable local laws.

## **USE OF AUTOMATED SYSTEMS FOR SECURITY**

We do not use your personal data for automated decision-making that produces legal or similarly significant effects. Any use of automated systems (e.g., for spam detection or fraud prevention) is limited to technical filtering and does not involve profiling or behavioral scoring that affects your legal status or rights.

## **FTC COMPLIANCE**

We are committed to complying with the Federal Trade Commission's (FTC) privacy and data protection standards. This means we take necessary precautions to protect your personal data from unauthorized access, use, or disclosure, and ensure transparency in our data collection practices.

## **DATA SECURITY AND BREACH NOTIFICATION**

We take the security of your personal data seriously and implement appropriate safeguards to protect it. In the unlikely event of a data breach involving your personal data, we will comply with applicable data breach notification laws and promptly notify affected users if required by law.

## **COMPLIANCE WITH GLOBAL DATA PROTECTION LAWS**

We process personal data in accordance with the data protection laws applicable in the country where the real estate agency operating this Website is registered, and, where relevant, the data protection laws applicable in the location of the individual whose data is being processed. This may include the GDPR and other national privacy regulations, depending on the circumstances.

## **MINORS' DATA PROTECTION**

Our services are intended solely for individuals who have reached the age of majority under the laws of their country of residence. By using our platform, you confirm that you meet this legal age requirement.

We do not knowingly collect or process personal data from individuals who are legally considered minors in their jurisdiction.

If we become aware that we have inadvertently received personal data from a minor without valid legal consent, we will take prompt action to delete such data in accordance with applicable laws.

We are committed to protecting personal data and complying with international data protection frameworks, including the GDPR, COPPA, and other relevant laws.

## **CHANGES TO CONSENT**

You may withdraw your consent for data processing at any time by contacting us or adjusting your cookie preferences.

## **CHANGES TO THIS PRIVACY POLICY**

We may update this Privacy Policy from time to time to reflect legal, technical, or business developments.

When we update our Privacy Policy, we will take appropriate measures to inform you, consistent with the significance of the changes. This may include notifying registered users via email or providing a notice on our platform.

The updated Privacy Policy will take effect five (5) business days after the notification has been sent or immediately upon publication on our website, depending on the nature of the changes.

It is your responsibility to review the updated Privacy Policy. By continuing to use the platform after the changes take effect, you signify your agreement to the revised Privacy Policy. If you do not agree with any modifications, you must discontinue using the platform.

The latest version of this Privacy Policy will always be available on our website.

## **PRIVACY BY DESIGN AND BY DEFAULT**

We are committed to the principles of Privacy by Design and by Default. This means that we integrate data protection into every stage of our service and platform development, from initial design to deployment and ongoing operation.

Our commitments include:

1) *Data Minimization*. We only collect the personal information that is necessary in order to respond to your inquiry or provide requested information. We do not request more data than required.

2) *Purpose Limitation*. Personal data submitted through this Website is used only for the purpose for which it was provided (for example, responding to your message or arranging a property viewing).

3) *No Public Disclosure by Default*. Personal information shared through contact forms is not visible to the public and is accessed only by authorized representatives of the Agency.

4) *Security Measures*. We take reasonable technical and organizational measures to protect personal data from unauthorized access, alteration, disclosure, or loss.

These may include secure email communication practices, controlled access to stored inquiries, and safe handling of digital records.

## **USE OF COOKIES AND ONLINE TRACKING**

This Website uses cookies to support basic functionality and improve user experience.

1) *Strictly Necessary Cookies*.

These cookies are required for the Website to function properly (for example, enabling navigation or form submission). You cannot disable them without affecting the performance of the Website.

2) *Preference and Performance Cookies*.

These cookies help us understand how visitors use the Website and allow us to improve content and usability.

Such cookies are used only if you provide consent when first visiting the Website.

### **Your Cookie Choices**

When you first visit this Website, you may be asked to accept or decline non-essential cookies. You may also adjust your browser settings at any time to block or delete cookies. Please note that disabling certain cookies may affect how the Website functions.

For more details, please refer to the Cookie Policy, which explains the types of cookies used and how to manage your preferences.

## **ELECTRONIC COMMUNICATIONS**

### *1) Communication Following Your Inquiry.*

If you submit your contact details through a form on this Website, the Agency may contact you in response to your request (for example, to provide property details or arrange a viewing).

Such communication is based on your expressed request and does not require separate marketing consent.

### *2) Optional Promotional Messages.*

The Agency may send marketing or promotional messages only if you have clearly given consent (for example, by actively subscribing to updates).

You may withdraw your consent at any time by following the unsubscribe instructions in the message or by contacting the Agency.

## **LANGUAGE VERSIONS**

This Privacy Policy is available in English. Where required by local law, we provide localized versions. Availability of translations may vary depending on the user's location and applicable legal requirements. In case of discrepancies, the English version shall prevail unless otherwise mandated by applicable law.

## **CONTACT US**

If you have any questions, requests, or concerns regarding this Privacy Policy or the handling of your personal data, please contact us using the email address provided on this Website.

We will review your request and respond within a reasonable timeframe in accordance with applicable data protection laws.

*Effective Date:* November 2025