



1.9.2026

NLB Real Estate d.o.o., Ljubljana
Šmartinska cesta 130
1000 Ljubljana
www.nlbrealestate.com

At NLB Real Estate d.o.o., Ljubljana, NLB Group member, registered to carry out real estate management activities, we are constantly developing and improving our services to make sure they meet your needs.

The collection and processing of relevant personal data allows us to adapt faster and better to your needs and wishes and enables you to have a more efficient communication with us and a better user experience. It is important to us to protect your privacy, so we want to use this information to help you understand what personal data we collect about you, why we collect it, how we use it, what processing operations are carried out, what your rights are and how you can exercise them.

Your personal data are carefully stored and protected to prevent any unjustified disclosure of data to unauthorised persons. We hereby undertake not to forward, lend or sell any personal data to a third party without prior notice and prior to obtaining your consent. In every and any case, we will ensure appropriate safety measures and your personal data will be processed only within the framework of legal grounds and selected purposes.

Who is responsible for managing your personal data?

Your personal data manager is:

NLB Real Estate d.o.o., Ljubljana, Šmartinska cesta 130, 1000 Ljubljana (hereinafter: **NLB RE** or the **Company**).

Who can you contact for further clarifications or information on your personal data processing, including your rights?

At NLB RE, the contact e-mail address for personal data protection matters is:

info@nlb-re.com

or you can send your question by regular mail to:

NLB Real Estate d.o.o., Ljubljana, Šmartinska cesta 130, 1000 Ljubljana.

When can we process your personal data?

To conclude and perform a contract with you

At NLB RE, we process personal data for the purpose of performing relevant services and measures before entering into a contract and during the performance of a contract with you, such as concluding a lease or purchase agreement.



We also process personal data of our external contractors, data of individuals, legal representatives, beneficial owners or proxies.

If required by law

At NLB RE, we process personal data for the purpose of complying with legal and administrative regulations, especially those governing real estate operations, reporting obligations, customer verification (prevention of money laundering and terrorist financing) and risk management.

For example: The Company may conduct an inquiry and obtain information about your personal and other data, particularly about your employment, assets, account numbers with banks and payment institutions, residence and other data with other data managers, if the NLB RE does not have them or you fail to provide them despite our request, and these data are necessary for the fulfilment of contractual obligations or there are legal grounds for such an inquiry. The legal basis for personal data processing is primarily legal requirements for keeping up-to-date records.

As a member of the NLB Group, we are obliged to report certain data, in compliance with applicable regulations or based on legitimate interest of NLB Group governance.

If there is a genuine and valid reason for doing so

At NLB RE, we also process personal data based on our legitimate interests as demonstrated in order to demonstrate our responsibility to you and to maintain a service offering on the market that will meet your expectations, carefully weighing our interests against your privacy rights.

On the basis of legitimate interests, we process data in the following cases, among others:

- measures to prevent, detect and investigate fraud and other harmful practices,
- measures for offer development and management (e.g. development of a new range of services; improvement, upgrade of the existing offer,...),
- implementation of marketing campaigns,
- communication with representatives of legal entities,
- market research, business and decision-making analyses,
- when invited to evaluate the service after the service has been provided.

When you have given your consent

Personal data processing may also be based on the consent given by an individual, which enables NLB RE to use his or her personal data for the purposes specified in the consent.

Consent **is provided voluntarily** and if you decide not to give your consent or revoke it later, this does not in any way reduce your rights arising from the business relationship with NLB RE or does not incur any additional costs or aggravating circumstances for you. The conclusion of a contract or the provision of services is not dependent on your consent.



How are your data collected and what types of personal data are processed?

At NLB RE, we obtain personal data of individuals from various sources. In most cases, you provide them directly to us when you choose a particular service. We also create certain data ourselves by processing data for the purpose of reporting, analysis, etc. In addition to that, we may also use other information about individuals that is accessible or has been provided to us from public sources (public registers, databases, internet applications, social networks or other public information sources) and data from other sources that have been provided to us by other providers of trust services for electronic authentication and identification (e.g. Rekono). All collected data and information are processed by the Company's employees only within the framework and for the purpose of performing their work. Personal data that have not been directly obtained from an individual are available from the personal data manager at the individual's request.

Basic identification and other identification data and contact details

We need your personal data, such as name and surname, date of birth, place of residence, tax number, telephone number and/or e-mail address, to be able to send you messages. These are basic identification and contact data that are necessary to close a transaction or to inform you about an offer.

Contacts with the Company

We keep a record of all our contacts with you, especially the date (or even time) of the contact and the reason for it. This applies to all types of contacts (phone, video call, SMS, mail, e-mail, etc.). We keep a record of these contacts so that we do not call you repeatedly for the same purpose. Whenever we inform you about an offer, we store information about whether you have accepted the offer or not, so that we do not offer you the same products or services more than once.

External sources

We want to be sure that our offer will suit you, which is why we sometimes also use data from external sources when our own data is not sufficient for targeting. Such sources mainly include public registers and records (e.g. the register of business entities, etc.).

Data and information we process to comply with our legal obligations

These are data that we need to collect, evaluate and store for a certain period in order to comply with our legal obligations. This includes, for example, the obligation to keep up-to-date records and archive data in accordance with various laws governing business activities, or to collect and evaluate data for the purpose



of preventing money laundering and terrorist financing and other legal requirements. Such data may include, for example: the source and origin of your income, mutual capital connections, nationality, citizenship, address of residence, field of activity, political exposure, etc. Based on your consent or other legal grounds, we may also use these data for other purposes in accordance with your requirements.

Who can use your personal data that you have provided to NLB RE?

NLB RE employees

Your personal data is processed by individual employees who need this data for their work and can therefore forward it to each other. This means that the information you have given to an employee of the Company will also be available to other employees, all in accordance with the need-to-do-my-work principle.

Contractual Processors

In addition to the employees, the users of personal data are also the employees of the Company's contractual processors, who can process your data only in accordance with the provisions set out in the contract, a certain law, permission or your consent. In any case, we ensure your personal data protection to the same extent as if the Company had processed it by itself.

Competent State Authorities

In certain cases, prescribed by applicable law, we must also forward or report your personal data to the competent state authorities and authorities responsible for financial or tax supervision (e.g. the Office for the Prevention of Money Laundering, Financial Administration of the Republic of Slovenia, courts, etc.). We must also forward it to third parties if such an obligation to provide or disclose information to the company is imposed by law. Further information on the Company's categories of users, contractual partners and contractual processors can be obtained upon a request submitted to the e-mail address info@nlb-re.com.

How are your personal data processed?

The Company does not use automated personal data processing.

How long do we keep your personal data?

The retention period of personal data depends **on the data processing legal basis and purpose** of each personal data category. Personal data related to sales transactions are stored permanently, those related to rental transactions are processed for ten years after the termination of the business relationship or after the transaction was carried out. Individuals' personal data collected for the purpose of contracting preparations are generally not processed for more than six months if the contract is not closed. Personal data processed



by the Company on the basis of an individual's consent are processed until the consent is revoked. Other personal data are stored only for as long as it is deemed necessary to achieve the purpose for which they were collected or further processed. Personal data will be deleted, destroyed, blocked or anonymised after their specific processing purpose has been fulfilled if there are no other legal grounds or if they are required to assert, execute or defend legal claims. Within the framework of the right to data access, a person may request information on the retention period of a particular type of data at any time.

What are your personal data protection rights?

If you wish to obtain information about your personal data processing, you can request it by exercising your **access right**. In addition to that, the Company allows you to exercise **the right to amend data** (e.g. if you find your personal data inaccurate), **the right to delete** your personal data (e.g. if there are no legal grounds for their processing) and **the right to transfer data** (e.g. if you want to transfer your personal data to another data manager).

If you do not agree to personal data processing that takes place based on our legitimate interests, or if you do not want your personal data to be used for direct marketing purposes, you have **the right to object by requesting** that the processing be terminated. You can submit this request in a way that enables your personal identification, i.e. in person at the Company's head office or in writing at the e-mail address info@nlb-re.com.

Your request will be answered without undue delay within a month at the latest.

You have the right to lodge a complaint with the supervisory authority for the protection of personal data at any time: Information Commissioner, Dunajska cesta 22, 1000 Ljubljana.

Can you withdraw or restrict your consent?

Your consent to personal data processing is voluntary. You can **limit or withdraw your consent to data processing at any time** by informing the Company, which will not bear consequences for any contractual relationship between you and the Company or the use of products and services that do not require such consent.

Even after the withdrawal of your consent, the Company will continue to process only those data required by law, to perform a contract with you and to pursue its legitimate interests.

The Company reserves the right to amend or supplement this General Information to ensure compliance with personal data protection regulations. Information is available on the Company's website.

Anything that is not specifically provided for in this General Information or the contract concluded between the Company and the individual shall be subject to the provisions of applicable law.

This General Information is effective and applicable from 01/09/2026 onwards.

NLB Real Estate d.o.o. Ljubljana