

VAREM ESTATE Sp. z o.o.
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KRS 0000920496

Warsaw, January 02, 2026

Approved by the President of the Management Board
Varem Estate sp. z o.o.
NIP 5252875516
Halina Harlamowa

INTERNAL GDPR PROCEDURE - 2026
Varem Estate limited liability company
NIP 5252875516

Chapter 1. Purpose and scope of the procedure

1. This procedure sets out the rules for the processing and protection of personal data in Varem Estate with its registered office in Warsaw, NIP 5252875516 (hereinafter Varem Estate) in accordance with the Regulation (EU) 2016/679 of the European Parliament and of the Council (GDPR).
2. The purpose of the procedure is:
 - a) protection of personal data of clients, contractors and associates,
 - b) reducing legal and organizational risks for Varem Estate,
 - c) introducing clear, understandable rules of conduct for the team.
3. The procedure is practical and operational - it describes how data is processed in the real work of a real estate agency.

Chapter 2. Who the procedure applies to

1. The procedure applies to:
 - the company owner,
 - brokers,
 - associates,
 - persons performing activities on the basis of civil law contracts.

2. Every person with access to personal data is obliged to apply this procedure.

Chapter 3. What data we process

1. As part of Varem Estate's activities, the following data is processed in particular:

- clients (sale, purchase, lease, tenant representation),
- property owners,
- contractors,
- associates.

2. The scope of data includes, but is not limited to:

- name and surname,
- contact details,
- identification data,
- data contained in transaction documents.

3. We do not process data "just in case" or data unnecessary for the provision of the service.

Chapter 4. Data processing rules

1. Personal data is processed:

- in accordance with the law,
- for a specific purpose,
- to a minimum extent,
- for the necessary time.

2. We process data only when there is a legal basis for it (contract, legal obligation, consent).

Chapter 5. Roles in GDPR - who is responsible for what

1. The personal data controller is Varem Estate.

2. Within the organization, the following division of roles is adopted:

- **Company owner** - is responsible for the compliance of data processing with the GDPR, makes decisions in disputed situations and oversees data security.
- **Broker/associate** - processes data only to the extent necessary to provide services and in accordance with this procedure.

3. Only authorized persons have access to personal data.

Chapter 6. Contact with the client and GDPR communication

1. Clients' personal data is processed solely in connection with the provision of Varem Estate's services.

2. The client receives information on the processing of personal data (information clause) upon concluding a real estate brokerage agreement with Varem Estate.

3. The information clause is provided in the content of the real estate brokerage agreement and also in the form of a link on the website varemestate.com.

4. We do not process client data for purposes other than those related to the service, unless the client explicitly consents to it.

Chapter 7. Sharing personal data

1. Client data may only be provided to:

- notaries,
- banks,
- developers,
- property managers,
- other entities necessary to carry out the transaction.

2. Data is provided only to the necessary extent.

3. It is forbidden to transfer personal data to third parties without a legal basis or the client's knowledge.

Chapter 8. Data security in daily work

1. Paper documents are stored in a way that prevents access by third parties.
2. Electronic data is secured with passwords and access is restricted to authorized persons.
3. It is forbidden to:
 - send sensitive data via private channels,
 - leave documents unattended,
 - use unsecured data carriers.

Chapter 9. Rights of data subjects

1. Every person whose data is processed has the right to:
 - access the data,
 - rectify it,
 - restrict processing,
 - erase the data - to the extent permitted by law.
2. Requests are fulfilled by the company owner.
3. The broker does not make independent decisions in this regard.

Chapter 10. Data protection breaches

1. Any suspected data protection breach should be immediately reported to the company owner.
2. The owner assesses whether the breach requires notification to the President of the Personal Data Protection Office (UODO).
3. Information about breaches is documented.

Chapter 11. Final provisions

1. The procedure is valid from the date of its approval.
2. The procedure is updated in case of changes in legal regulations or Varem Estate's operating model.

APPENDIX NO. 1

GDPR - FORMAL PART

1. Register of personal data processing activities

1. Varem Estate maintains a register of personal data processing activities in accordance with Article 30 of the GDPR.
2. The register includes in particular:
 - categories of persons whose data is processed,
 - purposes of data processing,
 - legal bases for processing,
 - categories of data recipients,
 - data retention periods.
3. The register is kept in electronic form and updated in case of changes in processing procedures.

2. Authorizations to process data

1. Only persons with a written authorization granted by the Controller have access to personal data.
2. The scope of authorization corresponds to the scope of performed activities.
3. Authorizations are recorded and are revoked upon termination of cooperation.

3. Entrusting data processing

1. In the case of using data processors, the Controller concludes personal data processing entrustment agreements.
2. Entrustment agreements are concluded in particular with entities providing services in the areas of:
 - accounting,
 - IT,

- hosting,
- CRM systems.

3. The Controller verifies whether the data processor ensures an adequate level of data protection.

4. Personal data protection breaches

1. Every person with access to personal data is obliged to immediately report any suspected data protection breach to the Controller.
2. The Controller assesses the breach and makes a decision on the necessity of:
 - reporting the breach to the President of the UODO,
 - informing the data subjects.
3. Breaches are documented in the breach register.

5. Final provisions

1. This Appendix constitutes an integral part of the GDPR Procedure applicable in Varem Estate.
2. The Appendix is valid from the date of its approval.