

DESCRIPTION OF PERSONAL DATA PROCESSING OF REAL ESTATE OWNERS

1. The purpose of the Description of personal data processing of Real estate owners (hereinafter – the Description) is to set the requirements for processing and protection of Personal data of the Real estate owners (natural persons), their representatives, representatives / employees of real estate owners (legal entities), former owners of real estate, other persons specified in the Real estate register extracts processed in the Company.
2. If this Description does not define certain rule, general provisions of the Description of personal data processing of employees, members of the governing bodies, shareholders (representatives), beneficiaries, authorised persons shall apply.
3. **Joint controllers of the Personal data** processed for the purposes below are: SILVESTICA GREEN FOREST ESTONIA OÜ, Company code 10817274, business seat address: Riia tn 24d Tartu, Tartu Tartumaa 51010, Estonia, phone No. +46(0)705-132430, electronic mail address: ekonomi@crkforest.se and Silvestica Green Forest AB, Company code 559107-2797, business seat: Vastra storg 22, 291 31 Kristianstad, Kingdom of Sweden, phone No. +46(0)705-132430, electronic mail address: ekonomi@crkforest.se.
4. The personal data is processed according to the below-stated conditions:

Purpose	Basis	Data categories	Storage term	Needs to be provided
Collection and verification of data for real estate transactions (purchase, etc.) and share purchase agreements, concluding a check of reliability of the other party (natural person) or shareholders, members of gov. bodies and beneficiaries	Contract conclusion and execution; The legitimate interest of the Company in identifying the signatory, executing person and object of the agreement, to check reliability of other party before the transaction; Legislation; Legitimate interest of the Company (to express or defend against claims)	Contact/identification data, Real estate or a company (shares) that is the object of the transaction (if the customer is a natural person)	During and for 2 years after the expiration of the sale-purchase contract or for 1 month if contract was not concluded; Personal data contained in the documents is stored for the terms established in the Local Laws	<ul style="list-style-type: none"> • Necessary for signing and implementing sale-purchase contract • Necessary according to the requirements of legal acts • Necessary in order to secure the legitimate interest of the Company
Conducting internal accounting	Legislation	(Seller and representative) Contact/identification data, VAT number, payment history (Customer - natural person) Contact/identification data, position, workplace (Customer - Legal entity, Customer's representative)	10 years after the operation	<ul style="list-style-type: none"> • Necessary according to the requirements of legal acts

5. If Data subject fails to provide his/her personal data which we have the obligation to process by the legal acts or which is necessary for signing/implementing the Sale-purchase contract, or such data is necessary in order to secure the legitimate interest of the Company – the Company will not be able to sign/implement the Sale-purchase contract with the Data subject.
6. The personal data can be disclosed to the following data recipients: Tax Administrator Banks, Auditors, Lawyers, Courts, Dispute Settlement Authorities, Real Estate Register (State Register); data processors (Employees of the Company, employees of CRK Forest Management AB, Owners and administrators of Information Systems, accounting service provider).
7. The Company shall protect personal data by ensuring its confidentiality, integrity and limited availability. Confidentiality means that personal data is not disclosed to persons who do not have access to these data. The Company ensures the confidentiality of personal data. Integrity means that personal data should be accurate and relevant for the purpose for which it is being processed. Limited availability means that only authorized persons (consumers) have access to and manage personal data for legitimate and defined purposes.
8. The Company shall take the necessary technical and organizational measures to protect personal data against unauthorized processing and / or loss. The Company installs the appropriate hardware and software, applies the necessary security measures (including physical and electronic access control).
9. Personal Data subject has the following rights:
 - 8.1. To know (be informed) about his/her Personal data processing.
 - 8.2. To familiarise with his/her Personal data processed.
 - 8.3. To request for correction of his/her Personal data.
 - 8.4. To request for erasure of his/her Personal data ('the right to be forgotten').
 - 8.5. To request for restriction of his/her Personal data processing.
 - 8.6. To data portability.
 - 8.7. To disagree with his/her Personal data processing.
10. Requests related to Data subject's personal data shall be submitted to the Company by registered letter to: Riia tn 24d Tartu, Tartu Tartumaa 51010, Estonia or e-mail address: ekonomi@crkforest.se.
11. The requests must include: information enabling the Data subject to be identified; requested actions; personal data for which such actions are requested. Only reasonable requests are responded. The Company examines the application within 30 (thirty) calendar days of its receiving, without any additional requests for time received, and informs the Data subject of the action taken on the request. The Data subject shall be informed in the form in which the request was made.
12. The Data subject may complain to the supervisory authority of the actions (omissions) of the Company in relation to the exercise of the Data subject's rights:

Estonian Data Protection Inspectorate
Address: 39 Tatari St., 10134 Tallinn
Telephone +372 627 4135
E-mail info@aki.ee
13. When processing personal data, the Company does not apply automatic decision-making.
14. Personal data is not transferred to a third country or to an international organization.
15. This Description may be reviewed once per calendar year on the initiative of the Data controller and / or in the exchange of legislation governing the processing of personal data.
16. Amendments to the Description shall take effect from the date of their approval.
17. This Description is valid until is changed or cancelled by the Company.