

## **Data Protection and Privacy Policy**

### **1 INTRODUCTION**

- 1.1 Protection of personal data is essential responsibility of every company. Accolade recognizes the importance of fundamental right of individuals to protection of their privacy and personal data. This policy is designed to outline the principles and guidelines that govern the protection of personal data of our clients, employees and all other individuals who entrust us with their personal data or whose personal data we otherwise process. Our commitment to protection of personal data is paramount for us as a crucial aspect of Accolade's overall regulatory compliance.

### **2 SCOPE AND PURPOSE**

- 2.1 This policy applies to all employees, contractors, suppliers, and other business partners of Accolade, regardless of their position, location, or the nature of their affiliation with Accolade ("**Associated Persons**").
- 2.2 This policy affirms Accolade's commitment to the protection of personal data and privacy of the individuals.

### **3 KEY DATA PROTECTION PRINCIPLES**

- 3.1 **Lawfulness, fairness and transparency:** Associated Persons must ensure that personal data is processed only when a clear legal basis exists, in a fair manner, and with full transparency towards the data subjects. They must never mislead individuals about the use of their personal data and must always respect applicable privacy policies and other documentation related to data protection when providing information to the data subjects.
- 3.2 **Purpose limitation:** Associated Persons must collect and use personal data only for specific, legitimate purposes that were clearly defined at the time of collection. They must not reuse the personal data for incompatible or unrelated purposes without proper legal justification or prior approval.
- 3.3 **Data minimisation:** Associated Persons must only collect and retain the minimum amount of personal data necessary to achieve the intended legitimate purpose. Unnecessary or excessive data collection must be avoided.
- 3.4 **Accuracy:** Associated Persons must take reasonable steps to ensure that personal data is accurate and up to date. They must promptly correct or report any known inaccuracies and should encourage data subjects to update their information regularly.
- 3.5 **Storage limitation:** Associated Persons must not keep personal data for longer than is necessary for the purposes for which it was collected. They must follow Accolade's data retention policies and ensure timely deletion or anonymisation of outdated or unneeded personal data.
- 3.6 **Integrity and confidentiality:** Associated Persons must protect personal data against unauthorized access, loss, or damage by following all applicable security procedures and reporting any security incidents immediately. They must follow all applicable security protocols, use secure systems and tools, and report any data breaches immediately.
- 3.7 **Accountability:** Associated Persons must act in a way that supports Accolade's ability to demonstrate compliance with data protection principles and obligations. They must follow

## **Data Protection and Privacy Policy**

internal policies, participate in training, and cooperate fully with audits, investigations, or data protection-related requests.

- 3.8 **Risk based approach:** The greater the risk that the type of processing carried out by Associated Persons may interfere with the interests or fundamental rights and freedoms of the individuals, the greater the transparency and security measures to be taken for that processing. If Associated Persons are unsure about the risks involved in the processing or about the specific obligations relating to the processing of personal data, they must contact the designated person responsible for the processing of personal data at respective Accolade's affiliated company.
- 3.9 Accolade adheres to an approach to data protection known as ***Privacy by design and by default***. It implements technical and organisational measures at the earliest stages of design of processing activities, in such a way that safeguards privacy and data protection principles from the onset. It ensures that it is taken as a basis for all its operations that personal data is processed with the highest privacy protections in place encompassing all the above listed principles.

## **4 COMPLIANCE AND ENFORCEMENT**

- 4.1 **Compliance:** Each Accolade's affiliated company complies with the rules set up in the General Data Protection Regulation (EU) 2016/679 and related legislation in area of personal data protection and related EU and local legislation, further detailed in respective Accolade affiliated company's internal policy governing the rules for processing of personal data. Associated Persons must familiarise themselves with these rules and fully comply with them.
- 4.2 **Responsibility:** It is the responsibility of all Associated Persons to understand and comply with this policy. Any questions regarding this policy should be directed to the responsible person (administrator of personal data or a person with a similar role in the company) designated by the relevant internal policy for each Accolade's affiliated company.
- 4.3 **Violations:** Violations of this policy may result in disciplinary action, up to and including termination of the relationship between Accolade and Associated Persons.

## **5 FINAL PROVISIONS**

- 5.1 Accolade's commitment to the protection of personal data is essential to our integrity and the trust we have built with our clients, partners, and the greater community. By adhering to this policy, we ensure that our focus remains on delivering exceptional real estate investment services, while securing full protection of personal data and privacy of individuals. By fostering an environment that respects fundamental rights and freedoms of individuals, we not only comply with our legal obligations but also enhance Accolade's standing as leader in its field, trust in its services as well as its value as a business.
- 5.2 The COO and the Group Legal Counsel of Accolade shall ensure that regularly, not less than every two years, this policy is revisited and reevaluated in light of development of Accolade's business and applicable laws.
- 5.3 This Policy was reviewed by the COO and the Group Legal Counsel of Accolade and approved by the Board of Directors of Accolade Holding, a.s. as the parent company of Accolade on 30 June 2025.