

O N E M A R K P R O P E R T I E S

Asset Management

GDPR

Consent and Privacy Policy

Confidential Document

Internal reference: OMP-GDPR-001 | Version 1.0 | Junho 2026

1. Identification of the Data Controller

OneMark Properties — Asset Management

Avenida da Liberdade, 129 — 7.º C, 1250-140 Lisbon, Portugal

Email of the Data Protection Officer (DPO): dpo@themark-properties.com

2. Categories of Personal Data Processed

In the context of the marketing of real estate assets, OneMark Properties collects and processes the following categories of personal data:

- ☐ Civil identification data (name, date and place of birth, nationality, ID document)
 - ☐ Tax identification data (Tax ID / TIN, tax residence)
 - ☐ Contact data (address, phone, email)
 - ☐ Professional data (profession, employer, income)
 - ☐ Financial and patrimonial data (source of funds, bank account)
 - ☐ Data on PEP status (under Portuguese Law 83/2017)
 - ☐ Signature and photograph data (from identification document)
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3. Purposes of Processing

Personal data is processed by OneMark Properties exclusively for the following purposes:

- Compliance with legal identification and due diligence obligations (Portuguese Law 83/2017);
 - Compliance with reporting obligations to the Central Register of Beneficial Owners (Law 89/2017);
 - Assessment and approval of the commercial transaction;
 - Preparation and execution of applicable contracts (promissory contract, deed of sale);
 - Communication with the data subject during the commercial process and post-sale;
 - Compliance with tax, accounting, and regulatory obligations.
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4. Legal Basis for Processing

The processing of personal data is based on the following legal grounds, as applicable:

- Compliance with a legal obligation to which the controller is subject (Article 6(1)(c) GDPR), in particular those arising from Portuguese Law 83/2017 and Law 89/2017;
- Performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract (Article 6(1)(b) GDPR);
- Legitimate interests pursued by the controller (Article 6(1)(f) GDPR), particularly in matters of risk management and fraud prevention.

5. Retention Period

Personal data will be retained for the period necessary to fulfil the purposes for which it was collected and, in any event, for the legally required periods, namely:

- 7 years following the end of the commercial relationship, to comply with obligations under Portuguese Law 83/2017;
- 10 years for retention of accounting and tax documentation;
- For the limitation periods applicable to any litigation arising from the transaction.

6. Recipients of Data

Personal data may be communicated, strictly within what is necessary and pursuant to contractual relationships or legal obligations, to the following categories of recipients:

- ☐ Competent public authorities (Tax Authority, IMPIC, Bank of Portugal, judicial authorities)
- ☐ Notary and land and commercial registry offices
- ☐ Partner banks for financing operations
- ☐ Subcontractors of OneMark Properties (legal, tax, accounting, audit, document management)
- ☐ Entities of the same corporate group, where applicable

7. Rights of the Data Subject

The data subject has the following rights under the GDPR:

- Right of access (Article 15 GDPR);
- Right to rectification of inaccurate or incomplete data (Article 16);
- Right to erasure (Article 17), subject to limitations arising from legal retention obligations;
- Right to restriction of processing (Article 18);
- Right to data portability (Article 20);
- Right to object (Article 21);
- Right to lodge a complaint with the Portuguese Data Protection Authority (CNPD) or other competent supervisory authority.

These rights may be exercised by written request sent to dpo@themark-properties.com or to the registered office of OneMark Properties.

8. Consent

I have read and accept the terms of the processing of my personal data as described in this document.

- ☐ I consent to the processing of my personal data for the purposes identified above. *
- ☐ I consent to receive commercial communications about future OneMark Properties projects (optional consent, revocable at any time).

9. Signature

Name and signature of data subject

Place and date
