

Kaamos Group Privacy Policy

Objective:

This Privacy Policy describes the processing of personal data of natural persons who use or intend to use services provided by companies within the **Kaamos and KC Energy OÜ group** (hereinafter Kaamos), including by visiting Kaamos websites, submitting their email address to receive newsletters, participating in client events, visiting Kaamos real estate properties or commercial buildings, entering into contractual relationships, or otherwise cooperating, collaborating, or engaging with Kaamos in the course of its business. This Privacy Policy also describes the processing of personal data of individuals who submit a job application with any of the Kaamos group companies, or who visit or work at Kaamos group companies' construction sites. Each of these data processing activities are described and the data controllers are indicated below.

Personal data is processed in accordance with *Regulation (EU) 2016/679 of the European Parliament and of the Council (dated 27 April 2016) on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC* (General Data Protection Regulation, hereinafter "GDPR").

For inquiries regarding personal data processing, you may contact:

Kaamos in Estonia:

+372 663 0300

E mail: info@kaamos.ee

Kaamos in Latvia:

[+371 2566 3663](tel:+37125663663)

E mail: info@kaamos.lv

Definitions:

- **Personal data** – Any information relating to an identified or identifiable natural person (e.g., name, email address, IP address, phone number, etc.).
- **Processing of personal data** – Any operation performed on personal data (collection, storage, transfer, deletion, etc.).

- **Data subject** – A natural person whose data is being processed.
- **Data recipient** – A legal or natural person to whom the data is disclosed.
- **GDPR** – General Data Protection Regulation.

1 Personal Data Processing

The personal data covered by this Privacy Policy may relate to customers, customer representatives, partners, potential partners, landowners, suppliers, and other individuals involved in business relationships with Kaamos. In this Privacy Policy, the term “customers” refers collectively to all individuals whose personal data is processed in connection with Kaamos services, business relationships, projects, and other activities.

The joint controllers of personal data are the following:

- **In Estonia:** Kaamos Group OÜ, Aktsiaselts Kaamos Kinnisvara, OÜ Kaamos Ehitus, KC Energy OÜ and the developer of the specific project the customer is interested in;
- **In Latvia:** Kaamos Group OÜ, Aktsiaselts Kaamos Kinnisvara, SIA Kaamos Real Estate, SIA Kaamos Construction, and the developer of the specific project the customer is interested in.

In order for Kaamos to communicate with potential partners, buyers, conclude various contracts, including establishment of partnerships, the sale of apartments and commercial premises, Kaamos companies process personal data of natural persons.

Personal data is primarily collected via public data bases, directly from the person when the customer emails us, provides its contact details through Kaamos’ website, project sales website, or social media, or partner having the consent.

Kaamos processes the following data for the purpose of providing services to its customers, performing the customer contract, or establishing partnerships:

1. **Identification data** (first name, surname, personal identification code).
2. **Contact details** (e-mail, telephone number, postal address).
3. **Client preferences** (size of household, preferred language of communication, current place of residence, most important interests and other data gathered when communicating with the customer)
4. **Transaction data** (data included in the notarial contract to be entered into with Kaamos and data concerning the interior decoration solutions selected by the customer).

5. **Data related to warranties** (warranty terms, defects and works completed.

In case the customer is a natural person, the legal basis for the processing for this purpose is taking steps at the request of the data subject to enter into an agreement with the data subject, and performance of the agreement with the data subject (Article 6(1)(b) of the GDPR). In case the customer is a legal person represented by the data subject, the legal basis for the processing for this purpose is the legitimate interest of Kaamos (Article 6(1)(f) of the GDPR).

Transaction data related to accounting is also processed to administer accounting processes, and the legal basis for such processing is a legal obligation applicable to the controller (Article 6(1)(c) of the GDPR). Kaamos may also process customers' and their representatives' personal data to conduct market analysis and improve its services. For this purpose, the customers' data is aggregated to gather insights about customer interests in order to enhance communication and improve Kaamos' services and offerings. The legal basis for processing is the legitimate interest of Kaamos in business development (Article 6(1)(f) of the GDPR). Where Kaamos invites customers to events or sends newsletters, the legal basis is the data subjects' consent (Article 6(1)(a) of the GDPR). More information about newsletters can be found in Section 4 of this Privacy Policy. In case of a dispute or disagreement with the customer, Kaamos may process personal data in order to establish, exercise and defend legal claims. In such a case, the legal basis for processing is the legitimate interest of Kaamos (Article 6(1)(f) of the GDPR).

2 **Website Visitors- Use Cookies**

This website uses cookies. Cookies are used, for example, for tracking and analyzing website usage in order to enhance its functionality. They do not collect client data such as email addresses, phone numbers, or personal ID numbers. Cookies do not provide access to data storage devices.

Kaamos uses cookies for the following purposes:

- **Technical cookies** – Necessary for the basic functioning of the website.
- **Analytical cookies** – To collect data on website usage and improve user experience. Some analytics tools, such as Google Analytics, may be offered by third parties.
- **Marketing cookies** – To personalize advertising and track the effectiveness of marketing campaigns.
- **Preference cookies** – To remember user preferences and settings.

Analytical cookies, marketing cookies and preference cookies are used only with the user's consent. Technical cookies that are necessary for the basic functioning of the website

cannot be declined by the user. Users can manage or disable cookies through your browser settings at any time.

3 Newsletter

Customers and other interested individuals can subscribe to Kaamos newsletter via Kaamos' websites, including via project-specific websites. The controller of personal data gathered for the purpose of sending newsletters is Kaamos Group OÜ for newsletters sent in Estonia and Kaamos Real Estate SIA for newsletters sent in Latvia.

- The newsletter contains various news and announcements about Kaamos' activities.
- To subscribe to the newsletter, you must enter an e-mail address, which Kaamos will process.
- Subscription to the newsletter is based on consent (Article 6(1)(a) of the GDPR).
- Consent to subscribe to the newsletter can be withdrawn at any time. If you wish to withdraw your consent, please press the "unsubscribe" button at the bottom of the newsletter.

4 Job Applications

When you apply for a job with us, Kaamos collects and processes the personal data you provide in your application documents (such as your name, contact details, education, work experience, and other information relevant to the position). We also process personal data collected through interviews, as well as from persons you indicate as your referees. This data is processed for the purpose of assessing your suitability for the role and carrying out the recruitment process. The controller of personal data is the Kaamos entity who has a job opening. The identity and contact details of the controller are visible on the job advertisement.

The legal basis for processing your data is Article 6(1)(b) of the GDPR (processing necessary for the performance of a contract or to take steps at your request prior to entering a contract) and, where applicable, Article 6(1)(f) of the GDPR (our legitimate interest in managing the recruitment process, as well as establishing, exercising and defending legal claims in case of potential disputes). Referees are contacted only if you give your prior consent (Article 6(1)(a) of the GDPR).

Your data will be stored only for as long as necessary to complete the recruitment process and in accordance with applicable legal retention periods. Data that are not used for establishing employment relationships are stored for no longer than 6 months. If we

wish to retain your data for future recruitment purposes, we will request your explicit consent under Article 6(1)(a) of the GDPR.

5 Video Surveillance

Kaamos conducts video surveillance in publicly accessible areas of commercial buildings, renewable energy facilities, and construction sites with the aim of monitoring compliance with occupational safety regulations and promptly preventing violations that could pose a serious threat to workers' health or even result in fatalities. Ensuring compliance with occupational safety requirements is a top priority to provide a safe working environment for all individuals involved on the construction site. Video surveillance is also carried out for the purpose of protecting the safety of individuals and property, ensuring the security of Kaamos' employees, visitors, and other persons, as well as for the prevention and detection of unlawful activities that may harm the interests of Kaamos or third parties.

Kaamos Ehitus OÜ in Estonia and SIA Kaamos Construction are the data controller regarding the personal data processed during video surveillance conducted at construction sites, while Kaamos Kinnisvara AS is the data controller regarding the personal data processed during video surveillance at commercial buildings. KC Energy OÜ is the data controller regarding the personal data processed during video surveillance at renewable energy facilities. The authorized data processor is the security service provider. Access to video recordings is strictly limited – only those individuals whose job duties reasonably require such access, as well as national law enforcement authorities in the event of an investigation into a criminal offense or a serious occupational safety violation, may access the footage. No audio recording is made during the video surveillance process.

The recorded video footage is stored for no longer than 14 calendar days, except in cases where the footage has been retrieved by national law enforcement authorities. Individuals are informed about video surveillance upon entering the monitored area. Informational signs with a camera symbol and the notice "VIDEO SURVEILLANCE" are placed in the relevant areas.

6 Security of Processing and Data Retention

Personal data is protected with available appropriate technical and organizational measures, which are centrally managed by Kaamos Group OÜ. The data is retained only for as long as necessary to fulfil the purposes described above or until the data subject requests its deletion and Kaamos is obliged under the GDPR to comply with the request.

7 Recipients of Personal Data

Kaamos may disclose personal data to:

- Between Kaamos group companies.
- IT service providers maintaining Kaamos' websites, providing cloud storage or other IT services to Kaamos group companies.
- Legal professionals, legal advisors, consultants and notaries.
- Event organizers and business partners.
- State authorities for compliance with regulatory requirements.
- Law enforcement authorities where this is required by applicable laws or where Kaamos deems it necessary to protect its own or third parties' legitimate interests.
- When we are planning any merger or sale of any Kaamos group company or its assets, potential buyers and their auditors, financial and legal advisors.

We may occasionally transfer personal data outside of the European Economic Area (EEA). If personal data is transferred outside the EEA, we ensure appropriate safeguards are in place, such as Standard Contractual Clauses (SCCs) or adequacy decisions. You may receive more information about the transfers of personal data and the applied safeguards by contacting us at info@kaamos.ee.

8 Data Subject Rights

Under the GDPR, data subjects have the following rights:

- **Right of access** – You may request information about the personal data processed and receive a copy.
- **Right to rectification** – If your data is inaccurate or incomplete, you may request correction.
- **Right to erasure ("right to be forgotten")** – You may request deletion of your personal data unless legal grounds prevent it (e.g., signed real estate purchase contracts will not be deleted).
- **Right to restrict processing** – You may request restriction of processing if there is a dispute about data accuracy or legality.
- **Right to data portability** – If processing is based on consent or contract and is carried out by automated means, you may request the transfer of your data to another controller.

- **Right to object** – If processing is based on legitimate interests, you may object if justified.
- **Right to withdraw consent** – If processing is based on consent, you may withdraw it at any time without affecting prior processing.
- **Right to lodge a complaint** – If you believe your data protection rights have been violated, you may file a complaint with the competent data protection authority.

*This Privacy Policy is effective as of **19.08.2026**. and will be updated as necessary. Should we amend this Privacy Policy, we will post the revised version on our website, including the date on which the changes take effect.*