

DATA PROCESSING POLICY

of Duna Terasz Grande Kft. related to the processing of personal data within the framework of the performance of its core activities

04.01.2021.

version 2.0

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PREAMBLE

This Data Processing Policy (**Policy**) **provides information** on the **processing** of personal data of the data subjects involved in the core activities of **Duna Terasz Grande Ingatlanforgalmazó Korlátolt Felelősségű Társaság** [Real Estate Distributor Limited Liability Company] (**Data Controller**).

The Policy has been prepared taking into account the GDPR, Act CXII of 2011 on Informational Self-determination and Freedom of Information [Privacy Act] as well as all other legal acts relevant to the core activities of the Data Controller. The legislation is listed in **Annex 1** of the Policy and the most important terms are described in **Annex 2**.

The Policy shall be valid from 04.01.2021 until revoked, with regard to the processing of personal data of the data subjects involved in the core activities of the Data Controller. The Policy is available in printed form at the Data Controller's registered office, as well as at the following URL: <https://dunaterasz.hu/>

The Data Controller reserves the right to unilaterally change this Policy at any time. Should the Policy be amended, the Data Controller will inform the data subjects accordingly.

Budapest, 04.01. 2021.

Duna Terasz Grande Kft.

I. NAME OF THE DATA CONTROLLER

The Policy contains the name and contact details of the Data Controller.

Name of the Data Controller: Duna Terasz Grande Ingatlanforgalmazó Korlátolt Felelősségű Társaság [Real Estate Distributor Limited Liability Company]

Short name of the company: Duna Terasz Grande Kft.

Registered office: 1138 Budapest, Turóc utca 9. A. lház. [staircase] 3. em. [floor] 3.

Trade register number: 01-09-333908

VAT ID: 26591870-2-41

Email: info@dunaterasz.hu

Phone number: +36 1 215 5555

II.1. DATA PROCESSING IN CONNECTION WITH REQUESTS FOR QUOTATION

The Data Controller processes personal data in connection with the requests for quotations received due to its real estate sales activities. The Data Controller strives to process only the personal data necessary for the successful preparation of the offer. The Data Controller processes the personal data obtained in connection with the offers received – regardless of the channel – as follows:

- Scope of personal data processed: surname and first name, title, email address, telephone number (optional), other data provided in the request for quotation (apartment size).
- Purpose of the Data Processing: Preliminary consultation, request for quotation
- Legal basis for data processing: in case of preliminary consultations, or a request for quotation, the legal basis for the data processing is taking the steps at the request of the data subject, prior to entering into a sales contract between the Data Controller and the data subject pursuant to Article 6 (1) (b) of the GDPR.

- Duration of data processing: 5 years after the request for quotation (general limitation period for enforcement). Upon expiry of the general limitation period available for enforcement or the longer retention period specified by law, the personal data will be deleted immediately and irrevocably.
- The source of personal data is the data subject.

The Data Controller, its contracted vendors acting on its behalf, Rackforest Kft. as a hosting service provider, MiniCRM as a CRM service provider as well as Linemedia Kft. and Appentum Kft. as developers of web interfaces have primary access to the personal data processed for the purpose of the request for quotation. The Data Controller does not transfer the processed personal data to persons domiciled in Hungary, Europe or third countries. If proceedings are instituted before a court or another authority, in which it becomes necessary to transfer the personal data to the court or authority, the court or authority may also have access to the personal data.

With regard to the personal data processed for the purpose of the request for quotation, you may exercise the rights of access, rectification, erasure, restriction of data processing and data portability. The conditions for exercising the rights of the data subject are specified in **Section VI** of the Policy.

II.2. DATA PROCESSING IN CONNECTION WITH THE PERFORMANCE OF THE CONTRACT

Due to its real estate sales activities, the Data Controller processes personal data in order to conclude and perform the sales contract. Contracts may also be concluded with the involvement of the Data Controller's sales staff. The Data Controller strives to process only the personal data necessary for the performance of the contract. The Data Controller processes the personal data obtained in connection with the conclusion and performance of the contract as follows:

- The scope of personal data processed: surname and first name, title, birth name, place and date of birth, address / residence, citizenship, mother tongue, mailing address, tax identification number, serial numbers of personal identification documents, data related to the real estate for sale, real estate registration and technical data, purchase price, payment schedule, source and amount of financing, other data recorded by the contracting parties in the contract of sale.
- The purpose of the data processing: preparing the conclusion of a sales contract, differentiating between customers, performing and executing the sales contract concluded between the Data Controller and the customer, providing the performance

under the contract, confirming the obligations and rights undertaken in connection with the contract, communication, the enforcement, recovery and sale of any claims that may arise in connection with the contract.

- Legal basis for the Data Processing: in the case of the conclusion and the performance of a contract, and in the case of a natural person contracting party, in the course of communication, the legal basis for data processing pursuant to Article 6 (1) (b) of the GDPR is the performance of a contract between the Data Controller and the data subject; in the event of enforcing a right or claim, and in the processing of contact details of legal persons, the legal basis is the data subject's legitimate interest in accordance with Article 6 (1) (f) of the GDPR.
- Duration of data processing: 5 years after the conclusion of the contract (general limitation period for enforcement). Based on Government Decree No. 181/2003. (XI. 5.) on the statutory guarantee related to the construction of residential housing, 10 years from the transfer of possession of the real estate, with regard to the enforcement of possible warranty claims.
- The source of personal data is the data subject.

The personal data processed for the purpose of concluding and performing a real estate sale contract may be accessed primarily by the Data Controller, by the Law Firm appointed by the Data Controller for preparing the conclusion of the contract, and by the General Contractor appointed by the Data Controller (processed data: name, e-mail address, telephone number, language of communication) for the purpose of technical consultation, furthermore by MiniCRM Zrt. as the operator of the CRM system and D&B Real-Estate Investment Kft. for the purpose of administrative and operational support of sales tasks. (Registered office: 1138 Budapest, Turóc utca 9. A. lház. [staircase] 3. em. [floor] 3.).

The Data Controller does not transfer the processed personal data to persons domiciled in Hungary, Europe or third countries. If proceedings are instituted before a court or another authority, in which it becomes necessary to transfer the personal data to the court or authority, the court or authority may also have access to the personal data.

With regard to the personal data processed for the purpose of concluding and performing a real estate sale contract, you may exercise the rights of access, rectification, erasure, restriction of data processing and data portability as well as the right to object. The conditions for exercising the rights of the data subject are specified in **Section VI** of the Policy.

II.3. HANDLING COMPLAINTS

The Data Controller accepts the complaints received orally (in person or by telephone) or in writing (by post or e-mail) in connection with the performance of its duties. As part of this, the Data Controller will process your personal data as follows

- Scope of personal data processed: complainant's surname and first name, contact details (e-mail address, telephone number), address, other personal data provided by him in connection with the complaint, case number, signature; in the presence of an authorized representative, surname and first name, place and date of birth of the authorized person as well as his mother's name.
- The purpose of data processing: to investigate and remedy a complaint.
- The legal basis for data processing: the data processing is the Data Controller's legitimate interest (Article 6(1) f) of the GDPR).
- Duration of data processing: remedy of a complaint, no longer than the period of claim enforcement (general limitation period of 5 years).
- Source of data: data subject.

The Data Controller does not transfer the processed personal data to persons domiciled in Hungary, Europe or third countries. If proceedings are instituted before a court or another authority in which it becomes necessary to transfer the personal data to the court or authority, the court or authority may also have access to the personal data.

With regard to the personal data processed for the purpose of complaint resolution, you may exercise the rights of access, rectification, erasure, restriction of data processing as well as the right to object. The conditions for exercising the rights of the data subject are specified in **Section VI** of the Policy.

II.IV. Processing data related to the visit to the website www.dunaterasz.hu

II.IV.1. What are the cookies?

Cookie means a fragment of a file or information that an Internet browser has downloaded from websites and stored on the computer of the data subject. These cookies are used by

the server storing the material of a given website to recognize when returning to the website, that the data subject has already visited the website.

By visiting www.dunaterasz.hu, the user concerned acknowledges and consents to the sending of one or more Cookies to his / her computer during the visits to the website, through which his / her browser will be uniquely identifiable.

Most web browsers accept cookies by default. If you think, you can switch your browser to reject Cookies or alert you that Cookies have been sent to your computer.

Like almost every company with a website, Duna Terasz Grande Kft. also uses such cookies, in order to provide certain functions or only for convenience. The cookies used by Duna Terasz Grande Kft. do not load, slow down or cause damage to your computer.

Third-party cookies may also be used on the website.

II.IV.2. Types of cookies

- Session Cookies:

These Cookies are temporarily activated while you are browsing. That is, from the moment the user opens the browser window until the moment he closes it. As soon as the browser closes, all session Cookies will be deleted.

- Persistent cookies:

These Cookies remain on the user's device for the period of time specified in the Cookie. They are activated each time the user visits the website.

- My cookies:

These cookies are created by the website that the user is visiting at a certain time.

- Third party Cookies

When a user visits a site, another party activates the Cookie through the website. If you are browsing a website that offers embedded content e.g. from Facebook or YouTube, you may also receive cookies from these sites. We do not control the generation of these Cookies, so we advise you to look for more information on specific external websites about the Cookies used by them and how to handle them.

II.V. Processing of user data of visitors who visit the website www.dunaterasz.hu

The website www.dunaterasz.hu uses/ can use Google Analytics, Google Remarketing, AdWords Conversion Tracking, and Facebook Remarketing codes.

The referenced programs may place on the affected user's computer cookies that collect user data. By acknowledging the use of cookies, data subjects allow the data controller to use Google Analytics, Google Remarketing, AdWords Conversion Tracking, and Facebook Remarketing programs, as well as consent to the data controller monitoring and tracking their user behaviour and using all services provided by the programs. In addition, the user

has the option to disable the recording and storage of cookies for future reference at any time as follows.

According to the information from Google, Google Analytics mainly uses first-party cookies to report visitor interactions on the site.

For more information, please visit:

<https://policies.google.com/technologies/ads?hl=hu>

Google Analytics:

We primarily use Google Analytics to generate website statistics, including measuring the performance of our campaigns. Using the program, we mainly obtain information about how many visitors visited the website and how much time the visitors spent on the website. The program recognizes the visitor's IP address, so it can track whether the visitor is a recurrent or a new visitor, as well as track what path the visitor has taken on the website and where he/she has entered.

Google Remarketing:

Using Google Remarketing, we may collect DoubleClick cookie data in addition to the regular Google Analytics data. DoubleClick cookies allow you to use the remarketing service, which primarily ensures that visitors to the website will later encounter the data controller's ads on free Google ad slots. The data controller may use Google Remarketing for its online advertising. The data controller's ads are also displayed by third-party service providers, such as Google, on Internet sites. The data controller and third-party service providers, such as Google, use their own cookies and third-party cookies (such as the DoubleClick cookie) together to find out about users' previous visits to the website and to optimize and display ads. The data subject may disable Google cookies on the Google ads opt-out page (http://www.google.com/privacy_ads.html).

Google AdWords Conversion Tracking:

The goal of Google AdWords conversion tracking is to enable the data controller to measure the effectiveness of AdWords ads. It is possible by using cookies placed on the user's computer that last for 30 days and do not collect personal information.

Facebook Remarketing:

The data controller uses the remarketing pixel of Facebook to increase the effectiveness of Facebook ads, to build a so-called remarketing list. Thus, after visiting the website, an external service provider such as Facebook can display advertisements on websites. Remarketing lists are not suitable for personal identification. The visitor's personal data are not included, only the browser software is identified.

You can find our Facebook advertising policies here: <https://www.facebook.com/policies/ads>

Request for quotation on the website www.dunaterasz.hu, by email or telephone

Duna Terasz Grande Kft. processes certain personal data of those requesting an offer on the website www.dunaterasz.hu, by e-mail or by telephone as follows.

The purpose of data processing: to make an offer, get in touch and keep in touch with the customer regarding the real estate corresponding to the customer's needs before the data collection prior to the conclusion of the contract.

Legal basis for data management (data communication, data processing): "data processing for the purposes of legitimate interests"

The scope of the processed data: name, e-mail address, telephone number, purpose of the request for quotation, room number of the apartment sought, source of information about the data controller and any other data provided by the customer in the text of the message.

External intermediary in charge of data processing:

Name: MITTE Communications Kft.

Registered office: 1061 Budapest, Paulay Ede utca 55.

VAT ID: 24730763-2-42

Email: batta@mittecomm.com

Deadline for deleting data: 2 years after the data was recorded

Data Processing:

Data Processors:

the detailed data can be viewed at the headquarters of the Data Controller

Possible consequences of the failure to provide data: failure to send an offer for the property offered for sale.

III. NEWSLETTER

In order to promote the real estate sales activities of the Data Controller, it sends a newsletter in electronic form (e-mail) and initiates a telephone call to those data subjects who subscribe to the newsletter on the Data Controller's website or in person at its

registered office. As part of this, the Data Controller will process your personal data as follows

- Scope of personal data processed: surname and first name, e-mail address, telephone number.
- The purpose of data processing: to send a newsletter in the form of an e-mail, to promote current discounts by telephone inquiries.
- The legal basis for data processing: the data subject's consent (Article 6(1) a) of the GDPR).
- Duration of data processing: cancellation obligation has occurred (withdrawal of consent (unsubscribe) or exercise of right of cancellation)
- Source of data: data subject.

The Data Controller, its contracted vendors acting on its behalf, Rackforest Kft. as a hosting service provider, Rocket Science Group LLC, as the operator of the Mailchimp service, Linemedia Kft. as a web editor, furthermore Appentum Kft. and MITTE Communications Kft. performing marketing activities have primary access to the personal data processed for the purpose of sending newsletters. The Data Controller does not transfer the processed personal data to persons domiciled in Hungary, Europe or third countries. If proceedings are instituted before a court or another authority, in which it becomes necessary to transfer the personal data to the court or authority, the court or authority may also have access to the personal data.

With regard to the personal data processed for the purpose of sending newsletters, you may exercise the rights of access, rectification, data portability, erasure, restriction of data processing as well as the right to withdraw consent (unsubscribe). The conditions for exercising the rights of the data subject are specified in **Section VI** of the Policy.

IV. CIRCULAR MAIL

The Data Controller sends a circular letter in the form of an email to those data subjects with whom it has entered into a business relationship through the real estate sales activity (conclusion of a real estate sales contract) in the past 36 months in order to promote its real estate sales activity. As part of this, the data controller will process your personal data as follows.

- Scope of personal data processed: surname and first name, email address.
- Purpose of data processing: to send circular letters in the form of an email.
- The legal basis for data processing: the data processing is the Data Controller's legitimate interest (Article 6(1) f) of the GDPR).
- Duration of data processing: the occurrence of cancellation obligation (exercise of right to object, or exercise of right to cancel)

The Data Controller, Rocket Science Group LLC as the operator of the Mailchimp service, Rackforest Kft. as a hosting service provider and MITTE Communications Kft. performing marketing activities have primary access to the personal data processed for the purpose of sending circular letters. The Data Controller does not transfer the processed personal data to persons domiciled in Hungary, Europe or third countries. If proceedings are instituted before a court or other authorities, in which it becomes necessary to transfer personal data to the court or authority, the court or authority may also have access to the personal data.

With regard to the personal data processed for the purpose of sending circular letters, you may exercise the rights of access, rectification, erasure, restriction of data processing as well as the right to object. The conditions for exercising the rights of the data subject are specified in **Section VI** of the Policy.

V. BAN LIST

The Data Controller maintains a ban list of data subjects who have withdrawn their consent to the sending of newsletters or objected to the sending of circular letters, in order to refrain from unsolicited requests in the future. As part of this, the data controller will process your personal data as follows.

- Scope of personal data processed: surname and first name, email address, telephone number, date of withdrawal of consent / objection
- Purpose of data processing: to avoid sending unsolicited marketing letters.
- The legal basis for data processing: the legitimate interest of the Data Controller to carry out the relevant economic activity and the interest of the data subject to fulfil the request (Article 6(1) f) of the GDPR).

- Duration of data processing: the occurrence of cancellation obligation (exercise of right to object, or exercise of right to cancel)

The Data Controller, Rocket Science Group LLC as the operator of the Mailchimp service, Rackforest Kft. as a hosting service provider and MITTE Communications Kft. performing marketing activities have primary access to the personal data processed for the purpose of maintaining ban lists. The Data Controller does not transfer the processed personal data to persons domiciled in Hungary, Europe or third countries. If proceedings are instituted before a court or other authorities, in which it becomes necessary to transfer personal data to the court or authority, the court or authority may also have access to the personal data.

With regard to the personal data processed for the purpose of maintaining ban lists, you may exercise the rights of access, rectification, erasure, restriction of data processing as well as the right to object. The conditions for exercising the rights of the data subject are specified in **Section VI** of the Policy.

V. DATA SECURITY

The Data Controller and the data processors have the right to get acquainted with your personal data exclusively to the extent necessary for the performance of the tasks belonging to their job. The Data Controller shall take all security, technical and organizational measures that guarantee the security of the data.

V.1. Organizational measures

The Data Controller enables access to its IT systems with personal rights. The principle of “necessary and sufficient rights” applies to the allocation of accesses, i.e. all users may use the IT systems and services of the Data Controller only to the extent necessary for the performance of their tasks, with the corresponding rights and for the required period of time. Access to IT systems and services should only be granted to a person who is not restricted for security or other reasons (e.g. conflicts of interest) and who has the professional, business and information security knowledge necessary to use it safely.

The Data Controller and the data processors undertake strict confidentiality rules in a written statement and are obliged to act in accordance with these confidentiality rules in the course of their activities.

V.2. Technical measures

The Data Controller stores the data – with the exception of the data stored by its data processors – on its own devices and in a data centre. The Data Controller stores the IT devices storing the data in a separate closed server room, protected by a multi-stage access control system with authorization control.

The Data Controller protects its internal network with multi-level firewall protection. In all cases, a hardware firewall (border protection device) is located everywhere at the entry points of the applied public networks. The Data Controller stores the data redundantly – i.e. in several places – in order to protect them from destruction, loss, damage or illegal destruction due to the failure of the IT device.

It protects its internal networks from external attacks with multi-level, active, complex malware protection (e.g. virus protection). The Data Controller implements the essential external access to the IT systems and databases operated by the Data Controller via an encrypted data connection (VPN).

The Data Controller will do everything with the utmost care to ensure that its IT tools and software continuously comply with the technological solutions generally accepted in the operation of the market.

During the development, the Data Controller develops systems, in which logging can be used to control and monitor the operations performed, and to detect incidents, such as unauthorized access. The Data Controller's server is secure and closed.

VI. YOUR RIGHTS

It is important for the Data Controller that its data processing meets the requirements of fairness, legality and transparency. To this end, you may request information about the processing of your personal data, as well as request the correction or with the exception of mandatory data processing, the deletion of your personal data, withdraw your consent, and exercise your right to portability and your right to object. In order for you to be aware of your rights and the conditions for exercising them, we provide you with the following information.

VI.1. Access

You have the right to have access to the personal data processed by the Data Controller upon your personal request submitted to the Data Controller. As part of this, you will receive information about:

- whether the processing of your personal data is in progress;
- the purposes of data processing;
- the categories of personal data concerned;
- the recipients or categories of recipients to whom the personal data have been or will be disclosed;
- the intended period for which the personal data will be stored;
- your rights;
- your legal remedies;
- information on data sources.

You may also request the Data Controller to provide you with a copy of the personal data that is subject to the data processing. In this case, the Data Controller shall provide the personal data in a structured, widely used, computer-readable format (PDF / XML) or in a printed version thereof, on paper. Requesting a copy is free.

VI.2. Rectification

On the basis of a personal application submitted to the Data Controller, you are entitled to request the correction of inaccurate personal data concerning you processed by the Data Controller and the completion of incomplete data. If the information necessary to clarify or supplement the untrue information is not available to the Data Controller, the Data Controller may request the submission of this additional data and the verification of the accuracy of the data. Until the data can be clarified or supplemented – in the absence of additional information – the Data Controller restricts the processing of the personal data concerned, and the operations performed on them, with the exception of storage, are temporarily suspended.

VI.3. Erasure

On the basis of a personal application submitted to the Data Controller, you are entitled to request the erasure of personal data concerning you processed by the Data Controller if one of the following conditions is met:

- we no longer need that data provided;
- you have concerns about the lawfulness of the processing of your data by us.

If, following your request, the Data Controller establishes that there is an obligation to delete the personal data processed by it, it shall terminate the processing of the data and destroy the previously processed personal data. In addition, the obligation to delete personal data may be based on the withdrawal of consent, the exercise of the right to object and legal obligations.

VI.4. Restriction of data processing

On the basis of a personal application submitted to the Data Controller, you are entitled to request the restriction of the processing of personal data concerning you processed by the Data Controller in the following cases:

- you are concerned about the lawfulness of the processing of personal data concerning you processed by the Data Controller and you request a restriction instead of deleting the data;
- in the future, the Data Controller no longer needs the data provided, but they are required by you for the establishment, exercise or defence of legal claims; or

The Data Controller automatically restricts the processing of personal data in case you dispute the accuracy of personal data. In this case, the restriction applies for the period that is needed to check the accuracy of the personal data.

During the restriction period, no data processing operations may be performed on the indicated personal data, the data may only be stored. In the case of restrictions on data processing, personal data may only be processed in the following cases:

- based on the data subject's (your) consent;
- for the establishment, exercise or defence of legal claims;
- protection of the rights of another natural or legal person;
- important public interest.

The Data Controller will inform you in advance about the lifting of the restriction.

VI.5. Data portability

On the basis of a personal application submitted to the Data Controller using its contact details, you are entitled to request the provision of your personal data processed by the Data Controller in order to use them for your specific purposes. In addition, you may also request the Data Controller to transfer your personal data to another data controller designated by you.

This right is limited only to personal data provided by you to us, processed on the basis of consent or for the performance of a contract. The portability of other data is not possible. The Data Controller shall provide the personal data in a structured, widely used, computer-readable format (PDF / XML) or in a printed version thereof, on paper.

The Data Controller informs you that the exercise of this right does not automatically lead to the deletion of personal data from the Data Controller's systems. In addition, you are entitled to get in touch or to keep in touch with the Data Controller again after the data have been transferred.

VI.6. Objection

Based on a request submitted using the contact details of the Data Controller, you may at any time object to processing data based on the legitimate interest of the Data Controller. In this case, the Data Controller shall examine whether there are any compelling legitimate grounds or reasons (e.g. the establishment, exercise or defence of legal claims) for the processing that override the interests, rights and freedoms of the data subject. If such reasons or interests can be identified, the Data Controller will continue to process personal data. Otherwise, the personal data can no longer be used.

VI.7. Withdrawal of consent

In the case of consent-based data processing, you have the right to withdraw your consent at any time without giving reasons. The withdrawal shall not affect the lawfulness of the consent-based processing prior to the withdrawal. However, the Data Controller will no longer perform any operations using your personal data and will delete them. You can give your consent using one of the above contacts of the Data Controller.

VI.8. Our procedure related to your request to exercise your rights

The Data Controller shall provide you information on the actions taken in response to your request to exercise your rights without undue delay, but in any event within one month of receipt of the request at the latest. That period may be extended by two further months where necessary, taking into account the complexity and number of the requests. The Data Controller shall inform you of any such extension within one month of the receipt of the request, together with the reasons for the delay.

If the Data Controller does not take action on your request, the Data Controller shall inform you of the reasons for not taking action and of the possibility of lodging a complaint with a

supervisory authority and seeking a judicial remedy without delay, but at the latest within one month of receipt of the request.

The Data Controller shall provide information on the measure or on taking no measures in the form specified by you. Where you made the request electronically, the information shall be provided by electronic means, unless otherwise requested by you.

As a general rule, the Data Controller shall provide the requested information free of charge, however, the Data Controller may charge a reasonable fee based on administrative costs for the additional copies you request.

The Data Controller shall communicate any rectification or erasure of personal data or restriction of processing to each recipient to whom the personal data have been disclosed, unless this proves impossible or involves disproportionate effort. At your request, the Data Controller will inform you of these recipients.

In order to comply with the request, the Data Controller must make sure that the person entitled wishes to exercise his or her rights. For this purpose, it may also be necessary for you to appear in person at the Data Controller's registered office for personal identification.

VII. YOUR LEGAL REMEDIES

If the Data Controller processes your personal data in an improper manner in violation of the law, and if the Data Controller has not or improperly complied with your request to exercise your rights, you may have several legal remedies.

VII.1. Filing a complaint with the National Authority for Data Protection and Freedom of Information

If you object to the activities of the Data Controller, you may lodge a complaint with the National Authority for Data Protection and Freedom of Information using one of the following contact details:

- Registered office: 1125 Budapest, Szilágyi Erzsébet fasor 22/C.
- Postal address: 1530 Budapest, Pf. 5.
- Telephone: +36-1-391-1400
- Fax: +36-1-391-1410
- Email: ugyfelszolgalat@naih.hu
- Website: <http://www.naih.hu>
- Initiation of a case online: <http://www.naih.hu/online-uegyinditas.html>

VII.2. Asserting rights before a court

In addition to the official remedy, you also have the option of going to court for the Data Controller's activities. The provisions of the GDPR, the Privacy Act, the Civil Code and the Code of Civil Procedure shall apply to the lawsuit. The trial falls within the jurisdiction of the tribunal. The lawsuit may, at the option of the data subject, also be instituted before the court of the place of residence of the data subject (see the list and contact details of the courts at the following link: <http://birosag.hu/torvenyszekek>).

Annex 1

Applicable legislation

When preparing the Data Processing Policy, the Data Controller took into account the relevant applicable legislation and the most important international recommendations, in particular the following:

- Regulation (EU) 2016/679 of the European Parliament and of the Council of 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- GDPR);
- Act CXII of 2011 on Informational Self-Determination and Freedom of Information (Privacy Act);
- Act V of 2013 on the Civil Code of Hungary (Civil Code);
- Act CXXX of 2016 on the Code of Civil Procedure (Civil Procedure);
- Government Decree No. 181/2003. (XI. 5.) on the statutory guarantee related to the construction of residential housing.

Annex 2

Definitions related to the processing of personal data

- data controller: the legal person who determines the purposes and means of the processing of personal data;
- data processing: any operation or set of operations which is performed upon personal data of files, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
- data transmission: making data available to a specific third party;
- data erasure: making the data unrecognizable in such a way that it is no longer possible to recover them;
- data marking: the identification of the data in order to distinguish it;
- limitation of data processing: the marking of stored Personal Data with the aim of limiting their processing in the future.
- data destruction: complete physical destruction of the data carrier;
- data processor: a legal person that processes personal data on behalf of the controller;
- recipient: a natural or legal person, public authority, agency or any other body to which the personal data are disclosed, whether a third party or not;
- data subject: an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;

- third party: any natural or legal person, public authority, agency or any other body other than the Data Subject, the Data Controller, the Data Processor and the persons who, under the direct authority of the Data Controller or the Data Processor, are authorized to process the Personal Data;
- consent of the data subject: any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her;
- personal data: any information relating to the data subject;
- objection: a statement by the data subject objecting to the processing of his or her personal data and requesting the termination of the processing or the deletion of the processed data.

Annex 3

Name and details of the data processors

Name of the Data Processor: Rackforest Informatikai Kereskedelmi Szolgáltató és Tanácsadó Korlátolt Felelősségű Társaság [IT Trade Service and Consulting Limited Liability Company]

Trade register number: 01-09-914549

VAT ID: 14671858-2-41

Registered office: 1132 Budapest, Victor Hugo utca 18-22. 3. em. [floor] 3008.

Email: info@rackforest.hu

Website: <https://rackforest.com/>

Activity performed: hosting services

Name of the Data Processor: Linemedia Korlátolt Felelősségű Társaság [Limited liability company]

Trade register number: 01-09-940357

VAT ID: 14898297-2-42

Registered office: 1141 Budapest, Komócsy utca 29-31. C. ép. [building] 1. em. [floor] 1.

Email: office@line45.com

Website: <http://www.line45.com/2017/>

Activity performed: web construction

Name of the Data Processor: MiniCRM Szolgáltató és Kereskedelmi Zártkörűen Működő Részvénytársaság [Service and Commercial Private Limited Company]

Trade register number: 01-10-047449

VAT ID: 23982273-2-42

Registered office: 1075 Budapest, Madách Imre út 13-14

Email: help@minicrm.hu

Website: <https://www.minicrm.hu>

Data Processing Policy: <https://www.minicrm.hu/adatvedelem/>

Activities performed: Operation of the CRM system

Name of the Data Processor: Rocket Science Group LLC

Registered office: 675 Ponce de Leon Ave NE Suite 5000 Atlanta, GA 30308 USA

Email: dpo@mailchimp.com

Website: <https://mailchimp.com/>

Activities performed: Operation of the Mailchimp service

Name of the Data Processor: MITTE Communications Korlátolt Felelősségű Társaság [Consulting Limited Liability Company]

Registered office: 1061 Budapest, Paulay Ede utca 55.

Trade register number: 01-09-179304

VAT ID: 24730763-2-42

Email: batta@mittecomm.com

Website: <https://www.mittecomm.com/>

Activities performed: marketing and PR activities

Name of the Data Processor: D&B Real-Estate Investment Kft Korlátolt Felelősségű Társaság
[Limited liability company]

Registered office: 1138 Budapest, Turóc utca 9. A lph. [staircase] 3. em. [floor] 3.

Activities performed: systematization and storage of data, storage and
transmission of contracts on behalf of the data controller

The current sellers can be found on the Duna Terasz Grande website:
www.dunaterasz.hu/kapcsolat