

PRIVACY NOTICE –
WWW.LIGETBUDAPEST.HU

I. NAME OF CONTROLLER

Controller: Városliget Ingatlanfejlesztő Zártkörűen Működő Részvénytársaság

registered address: 1146 Budapest, Dózsa György út 41.

company registration number: 01-10-047989; registered by the Metropolitan Court of Registration

tax number: 24819699-2-42

website: www.ligetbudapest.hu

II. TERMS OF PRIVACY POLICY

Városliget Zrt., the operator of www.ligetbudapest.hu as Data Controller, undertakes that all data processing related to its activities complies with the provisions of this Notice, applicable Hungarian laws and the legal acts of the European Union, in particular:

- Act CXII of 2011 of Hungary on the Right of Informational Self-Determination and Freedom of Information;
- 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);

Városliget Zrt. is committed to protecting the personal data of its clients and partners, and attaches utmost importance to respecting its clients' right to information self-determination. Városliget Zrt. shall process personal data confidentially and take all security, technical and organisational measures that guarantee the security of data.

Városliget Zrt. undertakes to publish highly visible and unambiguous communication prior to the collection, recording and processing of any Personal Data of its users, providing information about the method, purpose and principles of the collection of personal data.

In all cases where Városliget Zrt. intends to use the Personal Data provided for a purpose other than the original purpose of data collection, Városliget Zrt. shall inform the User of such, obtain the User's prior explicit consent and grant the User the opportunity to prohibit such a use.

Information on the processing of personal data by Városliget Zrt. in connection with www.ligetbudapest.hu will be available at all times on the www.ligetbudapest.hu website.

Városliget Zrt. is entitled to amend this Privacy Notice unilaterally, of which it shall provide information on the www.ligetbudapest.hu website.

III. THE LEGAL BASIS FOR PROCESSING

Városliget Zrt. shall process personal data in a transparent manner, for the purposes specified in advance, in accordance with the requirements of lawfulness and fair process, and only to the extent and for a period that are strictly necessary.

Processing shall be based on the following legal bases (GDPR, Article 6 (1)):

- the Data Subject has given consent to the processing of his or her personal data for one or more specific purposes (voluntary consent); The Data Subject shall have the right to withdraw his or her consent at any time during any point in the process of data processing.
- processing is necessary for the performance of a contract to which the Data Subject is party;
- processing is necessary for compliance with a legal obligation to which the Controller is subject (legal obligation);
- processing is necessary for the purposes of the legitimate interests pursued by the Controller or by a third party (legitimate interest).

We wish to point out to informants that if they do not provide their own personal data to Városliget Zrt., it is the duty of the informant to obtain the consent of the relevant Data Subject.

IV. THE PURPOSES OF PROCESSING

1. Electronic Newsletter

The purposes of processing:

Sending email newsletters to all those interested containing advertisements as well. If the user subscribes to the newsletter, Városliget Zrt. may send newsletters as often as it deems appropriate.

Legal basis for processing: voluntary consent of the Data Subject (GDPR Art. 6 (1)).

Scope of processed data: name, email address and data collected during profiling.

Deadline for deletion of data: The data provided will be processed by Városliget Zrt. until the User prohibits the use of personal data by unsubscribing. Users can unsubscribe by clicking the

Unsubscribe link at the bottom of the newsletter. Personal data will be deleted within 10 working days of receiving the request for deletion.

2. Customised offers, profiling

The purposes of processing:

Profiling helps ensure that the offers on the website and in newsletters provide the User with relevant information and personalised offers.

Legal basis for processing: voluntary consent of the Data Subject (GDPR Art. 6 (1)).

Scope of processed data: email address, name, address, information related to the use of the website (date and time of visit, duration, subsequent review of exhibited items, pages viewed, click through rate, search engine usage), shopping cart usage (order ID, value of ordered products), purchases (time and value of transaction, product, product category, discount applied, payment method), technical information (IP address, cookie ID, browser type, device type, Google, Facebook IDs, source page), usage information about newsletters and notification messages (email opening time, device, links clicked through, purchase details)

Deadline for deletion of data: The data provided will be processed by Városliget Zrt. until the User prohibits the use of personal data by unsubscribing.

3. Statistical data

The data may be used by the Controller for statistical purposes. The use personal the data in a statistically aggregated form may not include the name of the Data Subject or any other information in any form that can identify the Data Subject.

4. Data to be recorded technically

Technically logged data are the data generated during the use of the service by the User's login computer and logged by the data management system as a result of technical processes (e.g. IP address, session ID). Due to the operation of the Internet, the data to be automatically recorded are logged automatically by system, without the need for any specific statement or action by the User. The Internet will not work without these automatic server-client communications. Except as required by law, such data may not be linked to other personal data of the User. The data shall be accessible solely to the Data Controller. Log files that are automatically stored during the operation of the system will be technically stored for a reasonable period of time to ensure the operation of the system.

5. Web analytics

Google Tag Manager as an external service provider assists the independent measurement of website traffic and web analytics data. For details on processing measurement data, visit <http://>

//www.google.com/analytics. The data derived from Google Analytics shall be used by Városliget Zrt. solely for statistical purposes to optimise operation of the website.

6. Other data processing activities

Information on data processing activities not listed in this Notice will be provided upon requesting personal data.

Városliget Zrt. shall transfer personal data to authorities (e.g. courts, the prosecutor's office, the National Tax and Customs Administration) – if the authority has clearly specified the purpose and the scope of data requested – only in the amount and to the extent indispensable for attaining the purpose of the request.

Városliget Zrt. as Data Controller is entitled and obliged to transfer to the competent authorities any personal data at its disposal and duly stored by it, the transfer of which is required by law or by a legally binding order. The Controller cannot be held responsible for the transfer of such data and any consequences resulting therefrom.

The persons entitled to access personal data are employees or agents of Városliget Zrt., as well as Data Processors.

V. TRANSFER OF DATA, DESIGNATION OF DATA PROCESSORS

By using the service, the User agrees that Városliget Zrt. may forward their personal data to the following partners. Legal basis for the transfer of data: performance of a contract, Article 6 (1) (b) of the GDPR.

The www.ligetbudapest.hu website is developed and operated by: Webapix Szoftverfejlesztő Kft. (tax number: 23896860-2-41; company registration number: 01 09 985866, Registered address: 1021 Budapest, Hűvösvölgyi út 54. 2. ép. 3. em.)

The agent responsible for processing electronic data and sending the newsletter: Hubspot Ireland Ltd. (One Dockland Central, Guild Street, Dublin 1)

During processing, personal data will be transferred to a third country (United States of America), subject to full compliance with the relevant provisions of Chapter V of the GDPR.

Any data transfer by Városliget Zrt. not specified above shall be carried out only with the prior and informed consent of the User.

VI. MEANS OF STORING PERSONAL DATA, SECURITY OF DATA PROCESSING

The IT systems of Városliget Zrt. can be found at its headquarters and its data processors.

Városliget Zrt. shall select and operate the IT equipment used for the processing of personal data in the course of providing the service in order to ensure:

- that the personal data processed is accessible only to authorised persons (availability);
- that authenticity and authentication of the data processes are guaranteed (authenticity of data processing);
- that the personal data demonstrably cannot be changed (data integrity);
- that the personal data are protected against unauthorised access (data confidentiality).

Városliget Zrt. shall protect the personal data by appropriate measures, in particular, against unauthorised access, alteration, transmission, disclosure, deletion or destruction, as well as accidental destruction, damage and inaccessibility due to changes in the technology used.

As permitted by the current state of technical development, Városliget Zrt. shall take all technical, organisational and structural measures for the protection of the security of data processing that can ensure suitable protection against privacy risks arising in connection with data processing.

In the course of automated processing of personal data, Városliget Zrt. shall use additional measures to:

- prevent unauthorised data entry;
- prevent the use of automated data-processing systems by unauthorised persons using data-transmission equipment;
- ensure that it is possible to establish and verify the bodies to which personal data have been or may be transmitted using data communication equipment;
- ensure that it is possible to establish and verify which personal data have been entered into automated data-processing systems and when and by whom the data were entered;
- ensure that the installed systems can be restored in case of system disturbance; and
- ensure that errors occurring during automated processing are included in a report.

Regardless of protocol (e-mail, web, ftp, etc.), electronic messages transmitted over the Internet are vulnerable to network threats that can lead to fraudulent activity or the disclosure or modification of information. To prevent such threats, Városliget Zrt. shall take all precautionary measures that may be reasonably required. It shall monitor the systems to record any security deviances and provide evidence for each security incident. Monitoring the systems also makes it possible to verify efficiency of the precaution measures. Városliget Zrt. shall not be liable for any damage caused by unavoidable attacks in spite of all efforts it can be reasonably expected to make.

VII. RIGHTS OF DATA SUBJECTS

The data subject may request information on the processing of his or her personal data and the right to have his or her personal data rectified or, with the exception of mandatory data processing, to be deleted, withdrawn, and to exercise his or her right of data storage and opposition .

Changes to personal data or requesting deletion of personal data can be sent to our registered email address. In addition, certain personal data can be changed by modifying the personal profile page.

Városliget Zrt. shall provide the requested data and information free of charge. If Data Subject's request is manifestly unfounded or excessive, in particular because it is repeatedly submitted, Városliget Zrt. may charge a reasonable fee, taking into account the administrative costs of providing the information requested or taking the requested action, or refuse to act on the request.

Városliget Zrt. shall provide the Data Subject with a copy of the personal data subject to processing. For any further copies requested by the Data Subject, the Controller may charge a reasonable fee based on administrative costs. Upon request of the Data Subject, Városliget Zrt. shall provide the information in electronic form. The Controller shall provide the information within a maximum of one month from the submission of the request.

Városliget Zrt. shall inform all recipients of any rectification, erasure or restriction of data processing implemented by Városliget Zrt. to whom or to which personal data have been communicated, unless this proves impossible or requires disproportionate efforts. At the request of the Data Subjects, Városliget Zrt. shall inform them of these recipients.

Right to data portability The Data Subject shall have the right to receive the personal data relating to him or her which he or she has made available to the Controller, in a structured, commonly used and machine-readable format, and to forward such data to another controller.

Automated individual decision-making, including profiling: The Data Subject shall have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or similarly significantly affects him or her. The above provision may not be applied if the decision

- is necessary for entering into, or performance of, a contract between the Data Subject and the Controller;
- is authorised by Union or Member State law to which the Controller is subject and which also lays down suitable measures to safeguard the Data Subject's rights and freedoms and legitimate interests; or
- is based on the Data Subject's explicit consent.

Right to restriction of processing: At the request of the Data Subject, Városliget Zrt. shall restrict data processing if any of the following conditions are met:

- the Data Subject contests the accuracy of the personal data, in which case the limitation applies to the period during which the accuracy of the personal data can be verified;
- the processing is unlawful and the Data Subject opposes the erasure of the personal data and requests the restriction of their use instead;
- the Controller no longer needs the personal data for the purposes of the processing, but they are required by the Data Subject for the establishment, exercise or defence of legal claims;
- the Data Subject has objected to the processing; in this case, the restriction shall apply for a period until it is established whether the legitimate grounds of the Controller override those of the Data Subject.

Right of access of the Data Subject: The Data Subject shall have the right to obtain from the Controller confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data and the following information:

- processing is based on the Data Subject's explicit consent;
- the categories of personal data concerned;
- the Data Subject objects to the processing and there are no overriding legitimate grounds for the processing;
- the Data Subject has objected to the processing; in this case, the restriction shall apply for a period until it is established whether the legitimate grounds of the Controller prevail over those of the Data Subject;
- the Data Subject withdraws consent on which the processing is based and there is no other legal ground for the processing;
- the Data Subject contests the accuracy of the personal data, in which case the limitation applies to the period during which the accuracy of the personal data can be verified;
- the recipients or categories of recipient to whom the personal data have been or will be disclosed (recipients of data transfer);

Rules of procedure: Városliget Zrt. shall inform the Data Subject without delay, but in any event within one month of receipt of the application and the action taken in response to Data Subject's application.

If the personal data are not true, and the true personal data are available to the Controller, the personal data shall be corrected by the Controller.

If Városliget Zrt. does not take action on the request of the data subject, the Controller shall inform the data subject without delay, but at the latest within one month of receipt of the request on the reasons for not taking action and on the possibility of lodging a complaint with a supervisory authority and seeking a judicial remedy.

Where personal data processing is subject to restrictions, personal data may be processed, except for storage, only with the consent of the Data Subject, or for the purpose of making, enforcing or defending legal claims or protecting the rights of other natural or legal persons. Városliget Zrt. shall inform the Data Subject in advance of lifting the restriction on data processing.

Right to rectification: The Data Subject shall have the right to obtain from Városliget Zrt. without undue delay the rectification of inaccurate personal data concerning him or her.

Right to receiving information: Városliget Zrt. shall take appropriate measures to provide information on the processing of personal data to data subjects in an understandable and easily accessible form, using clear and unambiguous terms. The right to receiving information can be exercised through the email contact details provided in this Privacy Notice (adatvedelem@ligetbudapest.hu).

Right to object: The Data Subject shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her that is necessary for enforcing the legitimate interests of the Controller or a third party, including profiling based on those provisions. In the event of an objection, the Controller may not continue to process the personal data unless the Controller demonstrates compelling legitimate grounds for the processing that override the interests, rights and freedoms of the data subject or for the establishment, exercise or defence of legal claims. Where personal data are processed for direct marketing purposes, the Data Subject shall have the right to object at any time to processing of personal data concerning him or her for such marketing, which includes profiling to the extent that it is related to such direct marketing. Where the data subject objects to processing for direct marketing purposes, the personal data shall no longer be processed for such purposes.

Right to erasure: The Data Subject shall have the right to obtain from Városliget Zrt. the erasure of personal data concerning him or her without undue delay where one of the following grounds applies:

Right to withdraw consent: The Data Subject shall have the right to withdraw his or her consent at any time. The withdrawal of consent shall not affect the lawfulness of processing based on consent prior to its withdrawal.

VIII. ENFORCEMENT OPTIONS

If you have any questions or comments, please contact the Data Protection Officer at adatvedelem@ligetbudapest.hu.

Right to apply to a court: The Data Subject may take legal action against the Controller in case of violation of their rights. The court will conduct extraordinary proceedings in the case.

Data Protection Authority Procedure: Complaints can be submitted to the National Data Protection and Freedom Authority:

Name: National Data Protection and Freedom of Information Authority

Registered address: 1125 Budapest, Szilágyi Erzsébet fasor 22/C

Mailing address: 1530 Budapest, Pf.: 5.

Phone: 06.1.391.1400

Fax: 06.1.391.1410

Email: ugyfelszolgalat@naih.hu

Website: <http://www.naih.hu>

IX. DEFINITION OF TERMS USED IN THIS PRIVACY NOTICE

1. **PERSONAL DATA** means any information relating to an identified or identifiable natural person ('Data Subject'); 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 etc.;

2. **DATA PROCESSING** means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;

3. **RESTRICTION OF PROCESSING** means the marking of stored personal data with the aim of limiting their processing in the future;

4. **PROFILING** means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements;

5. **CONTROLLER** means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data;
6. **PROCESSOR** means a legal person, which processes personal data on behalf of the Controller;
7. **RECIPIENT** means a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not;
8. **THIRD PARTY** means a natural or legal person, public authority, agency or body other than the Data Subject, Controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data;
8. **CONSENT OF THE DATA SUBJECT** means 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;
10. **DATA MANAGEMENT** means the execution of technical tasks related to the data processing operations, irrespective of the method and the means used to perform the operations and the place of application, provided that the technical task is performed on the data;
11. **DATA ERASURE** means making the data unrecognisable such a way that their recovery is no longer possible;
12. **EEA MEMBER STATE** means a Member State of the European Union and any other state that is party to the agreement on the European Economic Area, as well as a state, the citizens of which, pursuant to an international agreement concluded between the European Union and its Member States and the state not party to the EEA Agreement, has the same status as a national of a state which is a party to the Agreement on the European Economic Area;
13. **DATA SUBJECT** means any natural person identified or identifiable, directly or indirectly, on the basis of personal data;
14. **USER** means a natural person who registers on the website of Városliget Zrt. or buys anything without registration;
15. **THIRD COUNTRY** means any state that is not an EEA member state;
16. **DISCLOSURE** means making the personal data accessible to anybody;