GENERAL DATA PROCESSING STATEMENT

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I. PREAMBLE

LIVING I. Ingatlanfejlesztő Befektetési Alap, LIVING II. Ingatlanfejlesztő Befektetési Alap, LIVING III. Ingatlanfejlesztő Befektetési Alap, LIVING IV. Ingatlanfejlesztő Befektetési Alap, LIVING V. Ingatlanfejlesztő Befektetési Alap, LIVING VII. Ingatlanfejlesztő Befektetési Alap, LIVING- Szabolcs Kft., ParkWest 2 Kft., V45 Kft., PW3 Ingatlanfejlesztő Korlátolt Felelősségű Társaság, PARK WEST Four Ingatlanfejlesztő Korlátolt Felelősségű Társaság as well as LIVING Service Kft. As joint Data Controllers in a single Group of Companies (hereinafter jointly referred to as: **LIVING, Joint Data Controllers** or **Data Controller**) fulfil their obligation relating to providing preliminary information about the processing of personal data on their part under Articles 13 and 14 of the General Data Protection Regulation No. 2016/679/EU (hereinafter **GDPR**[1]) by way of issuing this Data Protection Statement by providing the following detailed information about the various data processing activities by the Data Controller as set forth in Section VI:.

LIVING is engaged in the construction of modern urban homes, which improves the quality of life of their residents through people-centred services and smart solutions. The LIVING brand covers a Group of Companies specialised in residential real estates.

Pursuant to Preamble 37 of GDPR, Groups of Companies consists of a controlling company supervising controlled companies. In this case, the controlling company is **LIVING-Service Kft.**, with the other companies being the controlled companies. Pursuant to Preamble 48 of the GDPR, Data Controllers that are part of the Group of Companies may have a legitimate interest in transmitting personal data within the Group of Companies for internal administration purposes, including the processing of personal data of clients and employees. The general principles of transmitting personal data are not different even when the recipients of personal data transmission are located in a third country, however, in such a case, the Data Controller provides the adequate level of protection as required in Article 44 of the GDPR by applying the safeguards set forth in Chapter V of the GDPR. The controlling enterprise of the Group of Companies and the controlled companies both have the legitimate interest (as in Article 6(1)(f) of GDPR) to transmit personal data within the Group of Companies for internal administrative purposes, including the processing of the personal data of clients, including you, and the employees of the Group of Companies.

Data processing activities as herein described are performed in order to simplify and clarify administration within the Group of Companies. Personal data transmitted within the Group of Companies may be familiarised with by those employees within the member companies of the Group of Companies only when they have the necessary access authorisations necessary for attaining the purpose of data procession.

You are kindly requested to read this Statement, as the security of your personal data is of utmost importance for us. Should you have any question or comment in relation to this Data Processing Statement, please get in touch with the Data Controller before using living.hu and accepting

[1] *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.*

this Statement and before providing any personal data for us, by contacting us via any of the options below: gdpr@living.hu.

Please be informed that the Data Controller has the right to amend this Statement at any time by way of its unilateral statement without seeking any consent thereto and in view of the provisions of the relevant rules of law, subject to preliminary information of the Data Subjects, if need be. Considering the possibility that this Statement may be amended at any time, please regularly check the living.hu website or attend our public office to get to know what changes might have occurred.

II. DEFINITION OF TERMS

In view of the fact that Article 4 of the GDPR clearly defines some terms, we wish to provide further clarification by presenting some examples as to how they may be relevant in practice.

Definition of terms:	Explanations and examples
"Personal data" means any information relating to an identified or identifiable natural person; Article 4 of GDPR	Your name, phone number or any information about you, based on which you are or can be identified. In each case, the Data Controller lets you know which personal data is used and for what purpose.
"Data Subject" is an identified or identifiable natural person; Article 4 of GDPR	You or the person you name, who wishes to buy a real estate or wishes to use a service in this context
"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; Article 4 of GDPR	Data processing includes any and all action performed by the Data Controllers in relation to your personal data or the personal data of a natural person you name, e.g. recording, transmission and erasure of data...
"Data 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; Article 4 of GDPR	Data controllers include an enterprise in the LIVING brand, depending on the project you wish to buy real estate(s), and the services you wish to use in this context. An example for such Data Controller is LIVING-Szabolcs Kft.
"Joint Data Controller" Where the purposes and means of data processing are determined by a number of data controllers jointly, they are regarded as joint Data Controllers. Article 26(1) of GDPR	Joint data controllers within the LIVING brand include the members of the Group of Companies, that is, a number of enterprises jointly. The detailed list of join Data Controllers in the Group of Companies is set out in Section V of this Statement.
"Data Processor" means a natural or legal person, public authority, agency or other body who or which processes personal data on behalf of the controller; Article 4 of GDPR	Data Controllers maintain a separate list of persons and organisations who and which process personal data in the name and on behalf of the Data Controllers.
"Data Transmission" means the provision of access to personal data for a specific third party.	Transmission of your personal data to a third party that is independent from the Data Controller

	(e.g. enterprise) for the purpose set by the Data Controller.
"Properties" mean the properties presented at the website of living.hu for sales, which include condominium apartments, storage rooms and parking spaces in underground parking lot, and in certain buildings, stores and offices.	The list of currently available properties are available at the website of living.hu.
"Conclusion of Contract" the entering into contracts of registration, preliminary contracts, real estate sale contracts by the Data Controller and the Data Subject covering the newly build Properties offered by the Data Controller for sale.	If you have already selected the property of your choice, then you take a step further in the purchase of the real estate, and the processing of personal data necessary in this respect is covered in more detail in a separate and special data processing notice (as per Section VI.).
"Service" means the conclusion of a contract by the data subject with a legal person falling within the LIVING Group and the provision of other related services related to the conclusion of the contract and the sale of the offered Real Estate, as requested by the data subject.	The services you wish to use in relation to the property you have selected and wish to purchase, or other services in connection with the sale, such as newsletter services, or the sale of second-hand property.
"Website" means the living.hu website	
"Public Office" means any office of the Data Controller open for clients for personal contact	

III. UNDERTAKINGS BY THE DATA CONTROLLER

Within the Group of Companies, any and all Data Controller undertakes the obligation to comply with the principles set forth below in full and also ensure compliance therewith by its employees, partners and staff members, while enforcing the data protection and data security regulations at the highest possible level. Operation in line with the principles herein defined is a key requirement on the part of the Data Controller, which also covers and determines the entire data processing operations.

1) Ensuring compliance with the principles of lawfulness, fair action and transparency

The Data Controller follows the principle that the processing of personal data must be performed lawfully, fairly and for the data subjects, in a transparent manner.

The staff members of the Data Controller must pay particular attention to ensure that data processing is performed under a legitimate grounds (e.g. consent of the Data Subject, fulfilment of contract, fulfilment of statutory obligation, legitimate interest of the Data Controller).

In addition to ensuring legitimate grounds for the processing of data, the Data Controller also pays particular attention to ensure that its staff members process data under the principle of fair action, for example it will not use hidden surveillance systems, and data processing that could be suitable for misleading Data Controllers.

The Data Controller pays particular attention to ensure that any and all Data Subject is given transparent information about the processing of data relating to the particular Data Subject. To this end, the Data Controller created a set of data processing information materials, which is described in detail in Section VI hereof.

2) Ensuring compliance with the principle of purpose limitation

The Data Controller adheres to the principle that personal data may be processed for specific, clear and legitimate purposes, and personal data may not be processed for purposes inconsistent with these objectives. The Data Controller holds the view that in processing personal data, the specific purpose of data processing must be clearly defined, must also be legitimate, and must be clearly determined as at the time such personal data are collected.

The Data Controller undertakes the obligation to regularly review data processing procedures, and when it finds that a particular data processing has no purpose any longer, then it will forthwith arrange for the discontinuation of the particular data processing.

The Data Controller will not collect (store) personal data for use in the future in a data deposit, and as soon as the data processing has no purpose any longer, it will arrange for the discontinuation of the data processing.

3) The principle of data minimisation

The Data Controller deems it extremely important to ensure that personal data are adequate and relevant to ensure attainment of the purpose of data processing and to ensure that personal data is processed in the extent and type that is absolutely necessary to attain the particular purpose.

For this reason, the Data Controller directs the staff members to process (store, collect and record) data in the number that is necessary to attain the particular purpose only.

4) The principle of accuracy

Personal data must be accurate and up-to-date at all times. The staff members of the Data Controller must take every reasonable effort to ensure that personal data that prove inaccurate for data processing purposes are forthwith rectified or erased.

The Data Controller undertakes to make every measure to ascertain that staff members pay particular attention to ensure that personal data files contain accurate and correct data only. To this end, staff members must regularly check data in the data files with the involvement of the persons named in these data files. Each staff member must follow the instructions of the data protection officers in checking data in the data files.

If the data subject indicates that his or her personal data have changed or the employee is informed that his or her data have changed, then the Data Controller undertakes that the necessary measures will be taken to ensure that these changes are reflected in the records and databases managed, paying particular attention to the requirements of any specific regulations.

5) The principle of storage limitation

The Data Controller processes (stores) personal data for a period of time necessary to attain the particular purpose, except where a longer period of storage is prescribed by law. Once the purpose of data processing is attained, the Data Controller forthwith takes steps to discontinue the processing of personal data (erasure or pseudonimisation).

In its special and particular guidelines on data processing, the Data Controller sets the period of storage of personal data for the Data Subjects, and where it is not possible, then the Data Controller will inform the Data Subjects about the considerations used in setting this period of time.

6) Integrity and confidentiality

The Data Controller directs its every staff member to process personal data in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, by using appropriate technical or organisational measures.

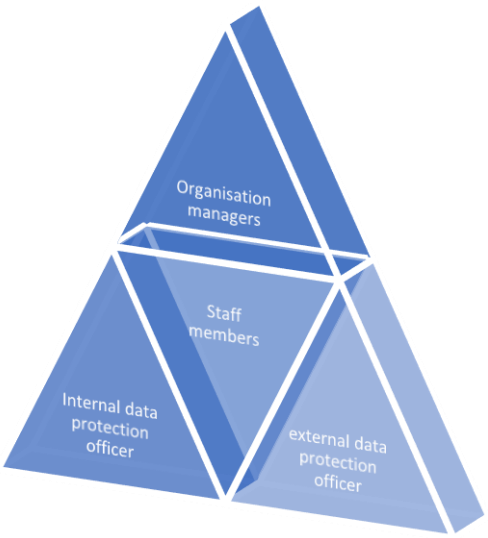
In view of the current state of science and technology, as well as costs of implementation, and nature, scope, circumstances and purposes of data processing, as well as the rights and freedoms of natural persons, taking also due heed to the varying degrees of likelihood and gravity of associated risks, the Data Controller undertakes to make measures in each case with the objective of including data protection principles and guarantees necessary for the protection of the rights of Data Subjects and for ensuring compliance with statutory requirements in the entire process of data protection, right at the beginning of designing this system.

7) The principle of accountability

The Data Controller is responsible for, and be able to demonstrate compliance with the above principles.

The Data Controller undertakes to comply with the fundamental principles and provisions governing the processing of the data of natural persons who come into contact with it, so as to attain the objective of protecting the privacy and rights of natural persons in accordance with the applicable legal provisions and official resolutions. The Data Controller furthermore undertakes to fully comply with the provisions of laws relating to data protection, in particular but not limited to, the provisions fo laws relating to the operation as a company and as data controller. The Data Controller is particularly committed to ensure that Data Subjects can properly exercise their rights as data subjects, and to this end, that Data Subjects receive adequate information.

IV. THE DATA PROTECTION ORGANISATION OF THE GROUP OF COMPANIES



V. JOINT DATA CONTROLLERS IN THE GROUP OF COMPANIES

1) Description of joint Data Controllers

Name of joint Data Controllers	Contact data	Note:
LIVING I. Ingatlanfejlesztő Befektetési Alap (hereinafter: "**LIVING I.**")	Registered seat: H-1095 Budapest, Máriássy utca 7. Central Bank of Hungary Registration number: 1221-33 Tax ID number: 18999266-2-43 Represented by: GLADIÁTOR Befektetési Alapkezelő Zártkörűen Működő Részvénytársaság (registered seat: H-1095 Budapest, Máriássy utca 7. Co. reg. number: Cg.01-10-049232; represented as sole signatory by: GYÁRFÁS Sándor (CEO)	
LIVING II. Ingatlanfejlesztő Befektetési Alap (hereinafter: "**LIVING II.**")	Registered seat: H-1095 Budapest, Máriássy utca 7. Central Bank of Hungary Registration number: 1221-42 Tax ID number: 19086862-2-43 Represented by: GLADIÁTOR Befektetési Alapkezelő Zártkörűen Működő Részvénytársaság	

	(registered seat: H-1095 Budapest, Máriássy utca 7. Co. reg. number: Cg.01-10-049232; represented as sole signatory by: GYÁRFÁS Sándor CEO)	
LIVING III. Ingatlanfejlesztő Befektetési Alap (hereinafter:**„ LIVING III.")**	Registered seat: H-1095 Budapest, Máriássy utca 7.; Central Bank of Hungary Registration number: 1221-80; Tax ID number: 19320825-2-43, statistical code: 19320825-6431-915-01; Represented by: GLADIÁTOR Befektetési Alapkezelő Zártkörűen Működő Részvénytársaság (registered seat: H-1095 Budapest, Máriássy utca 7. Co. reg. number: Cg.01-10-049232; represented as sole signatory by: GYÁRFÁS Sándor (CEO)	
LIVING IV. Ingatlanfejlesztő Befektetési Alap (hereinafter:**„ LIVING IV.")**	Registered seat: 1095 Budapest, Máriássy utca 7.; Central Bank of Hungary Registration number: 1221-82 Represented by: GLADIÁTOR Befektetési Alapkezelő Zártkörűen Működő Részvénytársaság (registered seat: H-1095 Budapest, Máriássy utca 7. Co. reg. number: Cg.01-10-049232; Tax ID number: 25887569-2-43; statistical code: 25887569-6630-114-01; represented as sole signatory by: GYÁRFÁS Sándor (CEO)	
LIVING V. Ingatlanfejlesztő Befektetési Alap (hereinafter:**„ LIVING V.")**	Registered seat: 1095 Budapest, Máriássy utca 7.; Central Bank of Hungary Registration number: 1221-84 Represented by: GLADIÁTOR Befektetési Alapkezelő Zártkörűen Működő Részvénytársaság (registered seat: H-1095 Budapest, Máriássy utca 7. Co. reg. number: Cg.01-10-049232; Tax ID number: 25887569-2-43; statistical code: 25887569-6630-114-01; represented as sole signatory by: GYÁRFÁS Sándor (CEO)	

LIVING VII. Ingatlanfejlesztő Befektetési Alap (hereinafter:**„ LIVING VII.")**	Registered seat: 1095 Budapest, Máriássy utca 7.; Central Bank of Hungary Registration number: 1221-126 Represented by: GLADIÁTOR Befektetési Alapkezelő Zártkörűen Működő Részvénytársaság (registered seat: H-1095 Budapest, Máriássy utca 7. Co. reg. number: Cg.01-10-049232; Tax ID number: 25887569-2-43; statistical code: 25887569-6630-114-01; represented as sole signatory by: GYÁRFÁS Sándor (CEO)	
PW3 Ingatlanfejlesztő Korlátolt Felelősségű Társaság (hereinafter: **„ PW3 Kft.")**	Registered seat: H-1097 Budapest, Albert Flórián út 10. Co. reg. number: Cg.01-09-378759; Tax ID number: 28993728-2-43; statistical code: 28993728-6811-113-01; represented as sole signatory by: Tatár Tibor Managing Director	
LIVING-Szabolcs Ingatlanfejlesztő Kft. (hereinafter: "**LIVING-Szabolcs Kft**.")	Registered seat: H-1097 Budapest, Albert Flórián út 10., Co. reg. number: 01-09-338783 Tax ID number: 26678481-2-43 Represented by: Tatár Tibor Managing Director	
ParkWest 2 Ingatlanfejlesztő Kft. (hereinafter: "**ParkWest 2 Kft**.")	Registered seat: H-1097 Budapest, Albert Flórián út 10., Co. reg. number: 01-09-355847 Tax ID number: 27896738-2-43 Represented by: Tatár Tibor Managing Director	
V45 Ingatlanfejlesztő, Kereskedelmi és Szolgáltató Kft. (hereinafter: "**V45 Kft.**")	Registered seat: H-1097 Budapest, Albert Flórián út 10., Co. reg. number: 01-09-697075 Tax ID number: 12657953-2-43 Represented by: GERŐ János Managing Director	

PARK WEST Four Ingatlanfejlesztő Korlátolt Felelősségű Társaság (hereinafter: "**PARK WEST Four Ingatlanfejlesztő Kft.**")	Registered seat: H-1097 Budapest, Albert Flórián út 10., Co. reg. number: 01-09-400468 Tax ID number: 27849712-2-43 Represented by: Tatár Tibor Managing Director	
LIVING-Service Kft.	Registered seat: H-1097 Budapest, Albert Flórián út 10., Co. reg. number: 01-09-341840; Tax ID number: 26733803-2-43 Represented by: Tatár Tibor Managing Director	**Controlling enterprise and the Data Controller selected for contacts in one**

2) The legal relationship among the joint data controllers in the LIVING Group of Companies and key particulars of the agreement between them in terms of content

The joint Data Controllers have appointed LIVING-Service Kft. (registered seat: H-1097 Budapest, Albert Flórián út 10.) to keep contact with Data Subjects.

Website:		www.living.hu
Contact options:	e-mail:	info@living.hu
	Phone:	+36-1/808-0888
Contact details of the Data Protection Expert:		gdpr@living.hu

The above legal persons falling in the LIVING brand determine the purposes and means of data processing as set forth herein jointly, and so they are regarded as joint Data Controllers in implementing the data procession activities. Its reason lies in the fact that the above joint Data Controllers jointly determine among themselves the allocation of their responsibilities for fulfilling the obligations relating to data processing, in particular their tasks of exercising the rights of the data subject and providing information to the data subject, with a view to providing to you the best possible service. It does not cause any disadvantage for the Data Subjects, because the Data Controllers act jointly, under joint and several liability, by creating a joint infrastructure. On the contrary, full scale service brings benefits for the Data Subjects.

The legal relations between the joint Data Controllers - and in line with it the sharing and responsibilities and tasks relating to the various data processing activities - are described in detail in the specific data procession notice describing such data processing.

The real estates available on the website is related to different projects, represented by different legal entities belonging to the LIVING brand, and therefore the data processing operations related

to each project are always carried out primarily by the Data Controller involved in the project. Other members of the group of companies also closely cooperate in the particular project, and data processing activities related to the associated services is performed by LIVING-Service Kft.

With a view to ensuring that Data Subjects receive any and all information they wish to have about the property of their choice and/or receive offers once they have contacted us and/or asked for an offer, the legal persons representing the project process the personal data provided when contacting us and/or asking an offer from us, as joint Data Controllers. Personal data collected by the Joint Data Controllers are processed in a joint electronic system.

Responsibility for the fulfilment of obligations arising from data processing is as defined below. Tasks within the scope of obligations arising from data protection laws and regulations will be performed by LIVING-Service Kft., in its capacity as the contact entity selected for the Data Subjects. Data Subjects may exercise their rights they may have in relation to the processing of their personal data by sending a request or complaint to LIVING-Service Kft. (by mail to its address: H-1097 Budapest, Albert Flórián út 10., or by email to its email address gdpr@living.hu.

If a Data Subject wishes to withdraw, amend (restrict) his/her consent given for the processing of his/her data, or if s/he wishes to object to data processing in a postal mail, s/he may do so by sending such mail to the address of LIVING-Service Kft.

The joint Data Controllers provide information to the Data Subjects in relation to the various data processing activities.

The sharing of responsibility as above for the processing of personal data between the Joint Controllers does not affect the right of Data Subjects to exercise their rights under data protection law in relation to and against each of the controllers.

VI. VARIOUS DATA PROCESSING ACTIVITIES

Please be informed that the various data processing activities performed by the Group of Companies are covered in detail in separate data processing notices, as follows:

- This Statement (General Data Processing Statement) It contains the common rules applicable to all data processing activities by the Data Controller as well as selection of the joint Data Controllers in the Group of Companies, and the entirety of the rights that Data Subjects have.
- Special Data Processing Statements This special data processing statement contains detailed information for the Data Subjects about the specific data processing activities as regards the facts and circumstances of data processing (e.g. purpose, legal grounds, period of retention, etc.), as provided by the Data Controller. (for example, provision of information about the preliminary contract of sale of property and information about data processing about the final contract of sale).
- Individual Data Processing Statements It contains detailed information about the data processing activities (e.g. purpose, legal grounds, period of retention, etc.) performed by the Data Controller exclusively in individual cases (for a short period of time) and which applies to the narrow group of Data Subjects (e.g. data processing relating to one-off prize awards or marketing campaigns).

VII. WHAT RIGHTS DO YOU HAVE IN THE CONTEXT OF THE PROCESSING OF YOUR PERSONAL DATA?

The purpose of this chapter is to inform you about the rights and remedies you have in relation to your personal data, which are ensured by the Data Controller to you irrespective of the legal grounds of data processing.

The interconnection of rights Data Subjects have and the legal grounds is shown in the following table, for the Data Subjects to be clear what rights they have in the case of application of the various legal grounds.

	Right for preliminary information	Right of access	Right of rectification	Right of erasure	Limitation	Data portability	Objection	Withdrawal of consent
Consent	✓	✓	✓	✓	✓	✓	✕	✓
Fulfilment and preparation of contract	✓	✓	✓	✓	✓	✓	✕	✕
Legal obligation	✓	✓	✓	✕	✓	✕	✕	✕
Material interest	✓	✓	✓	✓	✓	✕	✕	✕
Public obligation, public body powers	✓	✓	✓	✕	✓	✕	✓	✕
Legitimate interest	✓	✓	✓	✓	✓	✕	✓	✕

In view of the fact that LIVING has appointed a Data Controller to keep contact with each of the Data Subjects, they may exercise their rights they may have as described herein via the appointed Data Controller. In view of joint data processing, the Data Subjects may accordingly contact the appointed Data Controller (see Section V./2) with their concerns, and the response from the Data Controller is to be regarded as a joint response from the joint Data Controllers.

Requests by the Data Subjects in the context of the enforcement of their rights may be submitted to the Data Controllers by any of the means of contact, however, with a view to simplifying the process of case management, we suggest that requests be submitted via the email-address gdpr@living.hu.

We wish to highlight the fact the with a view to protecting your rights, the Data Controller after the submission of the request must check whether the request was indeed received from the person having the powers to exercise the particular Data Subject right. In case of doubt, the identity of the particular Data Subject must be ascertained, and for this reason, the particular right may be exercised subject to the identification of the Data Subject.

1) The right to be informed

Data Subjects have the right to receive information about the fact relating to data processing and the circumstances of data processing which having to request such information.

a) If personal data are collected by the Data Controller directly from the Data Subject, then the Data Controller - in addition to the content of this document - provides detailed information in special / purpose-related data processing guides that relate specifically to the particular subject, with data set forth in Article 13 of GDPR:

The Data Controller provides the information with content as above when collecting personal data.

b) Where the source of personal data collected by the Data Controller is not directly the Data Subject, then the content of the information is supplemented with the information described below (as set forth in Article 14):
   - source of personal data;
   - categories of processed data.

   The Data Controller provides information to the Data Subjects covering the above content within a reasonable time from obtaining the personal data, or within one month at the latest. If the Data Controller uses the personal data for contact with the Data Subject, the information is to be provided when contacting the Data Subject. Where data is expected to be provided to another recipient, the Data Controller provides the information for the first time when the personal data is provided at the latest.

   The information must be provided to the Data Subjects within one month from obtaining the data at the latest, which means the above deadlines are within this one month period.

Data Controllers within the Group of Companies wish to fulfil the above obligation on their part by issuing data processing guides and regularly updating them. These guides are available at the registered seat, public offices in hard copy format and on the website of the Data Controller. At the request of the Data Subject, the guide applicable to him/her are sent by the Data Controller to the email-address or mailing address provided by the Data Subject.

2) Right of access by the data subject

The Data Subject has the right to receive from the Data Controller at his/her request all information about the processing of his/her personal data.

Under this obligation, the Data Controller provides information about the following facts:

a) the purpose of data processing,
b) the personal data processed by the Data Controller and the categories of such data,
c) the recipient and categories of recipients,
d) the recipients to whom the personal data have been or will be disclosed,
e) in case of transmission of data to a third country, the compulsory components and the appropriate safeguards as set forth in Article 46 of GDPR,
f) the legal grounds of data processing,
g) the period of data processing, and where it is not possible, the factors considered in determining the period of data processing,
h) if the personal data are nor directly provided by the Data Subject, then all information determined in this context as set forth in GDPR,
i) the rights that Data Subject have under GDPR, and the manner they may be exercised,
j) where the Data Controller applies automated decision-making, including profiling, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the Data Subject,

The data controller must provide a copy of the personal data undergoing processing to the Data Subject at his/her request. Where the data subject makes the request by electronic means, and unless otherwise requested by the Data Subject, the information shall be provided in a commonly used electronic form, except where the Data Subject asks his/her request to be completed in some other way. The Data Controller fulfils the request made by the Data Subject free of charge for the first time. For any further copies requested by the data subject, the Data Controller reserves the right to charge a reasonable fee on the grounds of compensation for costs, which is based on the administrative burden and extra costs arising in fulfilling the request.

The Data Controller will limit or reject to provide information on the basis of the principle of

necessity and proportionality, where the request made by the Data Subject adversely affects the rights and freedoms of others, or where the rights of the Data Subject under the law is to limited in accordance with law, for the fulfilment of a legal obligation or in accordance with an international treaty, and where special data processing is to be made (for national security, state security, defense, criminal case data processing, or examination of ethical or disciplinal breach of duties, etc.) and where it is necessary to ensure the efficiency or procedures or investigations specified by the Data Subject.

3) The right to rectification

Data Subjects have the right to obtain from the Data Controller without undue delay the rectification of inaccurate personal data concerning him or her, as claimed by such Data Subject. When the Data Subject finds that the range of data processed by the Data Controller are incomplete, Data Subjects have the right to have incomplete personal data completed, including by means of providing a supplementary statement, taking into account the purposes of the processing,

Where the personal data processed by the Data Controller are incomplete, incorrect or deficient, then at the request of the Data Subject, the Data Controller will complete, correct or supplement the particular data without any delay, where it is not limited by law.

The Data Controller is entitled to rectify personal data concerning the data subject within its own competence, if the circumstances giving rise to the rectification are detected by the Data Controller itself. If the personal data is not accurate and the accurate personal data is available to the Data Controller, the Data Controller must rectify the personal data without the data subject's request. The Data Controller must inform in writing the Data Subject, the Data Processor processing the corrected data and the Data Controller to whom the original data was transmitted about the rectification. The Data Controller informs the Data Subject in writing and in case of involvement of the Data Processor, also the Data Processor, and if need be, the Data Controller about the completion of the data rectification, and in case of the two letter actors, about the necessity of the rectification.

The Data Controller is exempted from the obligation of rectifying, correcting and supplementing data if the accurate, correct or incomplete data is not available, and they are not provided by the Data Subject either, or where the authenticity of the personal data provided by the Data Subject may not be established beyond doubt.

4) The right to erasure (‘right to be forgotten’)

At the request of the Data Subject, the Data Controller must erase the personal data without undue delay where one of the following grounds applies:

a) the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
b) the Data Subject withdraws his/her consent on which the processing is based and where there is no other legal ground for the processing;
c) the Data Subject objects to the processing and there are no overriding legitimate grounds for the processing;
d) the personal data have been unlawfully processed;
e) the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the Data Controller is subject;
f) personal data was collected in relation to information society services offered directly to children - in the absence of the consent of a person with parental control over the particular child.

Where the Data Controller has made the personal data public and is obliged to erase the personal

data, the Data Controller, taking account of available technology and the cost of implementation, must take reasonable steps, including technical measures, to inform Data Controllers processing the personal data that the Data Subject has requested the erasure by such Data Controllers of any links to, or copy or replication of, those personal data.

The Data Controller herewith informs the Data Subjects about the fact this right is not unlimited when exercised. The right of Data Subjects to have their data erased may be limited in the following cases:

a) when exercising the right of freedom of expression and information;
b) when exercising the right of being informed;
c) in compliance with a legal obligation which requires processing by Union or Member State law to which the Data Controller is subject;
d) in case of the establishment, exercise or defence of legal claims (e.g. where the personal data is necessary in a procedure as a piece of evidence);
e) when performing a task carried out in the public interest or in the exercise of official authority vested in the Data Controller;
f) for reasons of public interest in the area of public health;
g) for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in so far as the right is likely to render impossible or seriously impair the achievement of the objectives of that processing.

If the Data Subject provides the Data Controller with personal data which are not necessary for the purposes of the processing, the Data Controller must return the data medium containing the personal data (e.g. a form) to the data subject, stating the reasons for the return. Exception to the above includes the situation where the return would pose a disproportionate burden and cost on the Data Controller, and in this case, the Data Controller will erase or destroy the data (e.g. data in electronic systems). Where personal data are processed under the consent given by the Data Subject, and the Data Subject withdraws his/her consent for the processing of his/her personal data, and Data Controller will discontinue the processing of data (erase the data), but it will not affect the legitimacy of data procession performed before the withdrawal of the consent.

5) The right to restriction of data processing

Data Subjects have the right to obtain from the Data Controller restriction of processing where one of the following applies:

a) the Data 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;
b) the accuracy, correctness and completeness of the personal data is contested by the Data Subject, and the accuracy, correctness and completeness of the personal data may not be established beyond doubt. In such cases, the Data Subjects may request that the processing of his/her personal data be limited until such time when the doubt is clarified,
c) the processing is unlawful and the Data Subject objects the erasure of the personal data and requests the restriction of their use instead;
d) the Data Subject has objected to processing pursuant to Article 21(1) pending the verification whether the legitimate grounds and interests of the Data Controller override those of the Data Subject.

6) The right to data portability

Data subjects have the right to receive the personal data concerning him or her, which he or she has provided to a Data Controller, in a structured, commonly used and machine-readable format, and have the right to transmit those data to another Data Controller without hindrance from the Data Controller to which the personal data have been provided, where the processing is based

on consent or on a contract and the processing is carried out by automated means.

In exercising his or her right to data portability, Data Subjects have the right to have the personal data transmitted directly from one Data Controller to another, where technically feasible.

Data Subjects must acknowledge that the exercise of the right to data portability may not infringe the right to erasure, and may not adversely affect the rights and freedoms of others, and may not be used if the processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Data Controller.

In fulfilling the request to exercise this right, the Data Controller must make personal data accessible for the Data Subject in a transparent manner, and will make efforts to use the file format specified by the Data Subject, enabling software-based applications to identify data therein with ease.

7) The right to object

Where personal data is process on the basis of legitimate interests of the Data Controller, Data Subjects 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 including profiling based on those provisions.

Data Controllers may no longer process the personal data unless the Data Controller demonstrates compelling legitimate grounds for the processing which override the interests, rights and freedoms of the Data Subject or for the establishment, exercise or defence of legal claims.

Where the Data Subject objects to processing of data for direct marketing purposes, the personal data shall no longer be processed for such purposes.

Where personal data are processed for scientific or historical research purposes or statistical purposes pursuant to Article 89(1) of GDPR, Data Subjects, on grounds relating to his or her particular situation, have the right to object to processing of personal data concerning him or her, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

8) The right to withdraw consent

Data Subjects have the right to withdraw any consent they have given. If a Data Subject withdraws his/her consent, such withdrawal does not affect the legitimacy of the processing of personal data performed before such withdrawal. The Data Controller herewith informs Data Subjects that the withdrawal of a consent is not retrospective in nature, and the statement of withdrawal will cover data processing activities to be performed in the future.

If the conditions so allows, the Data Controller must erase / pseudonymisate personal data relating the Data Subject after the withdrawal of the consent from the data file associated with the particular data processing.

With a view to ensuring compliance with the principle set forth in Article 5 (2) of the GDPR, the Data Controller will store the consent statement by the end of the statutory limitation period (currently 5 years) from the date of withdrawal, on account of the burden of proof on the part of the Data Controller.

9) Data Subjects may seek to be excluded from automated individual decision-making,

including profiling

Data Subjects have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him/her or similarly significantly affects him/her. The foregoing does not apply if the decision is:

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

VIII. REMEDIES

1) Responding to the request of the Data Subject

The Data Controller, without undue delay or within one month of receiving a request at the latest must inform the Data Subject about the measures it has taken in response to the request from the data subject concerning his/her intention to exercise his/her rights. In need be, and in view of the complexity of the request and the number of requests, this turnaround time may be extended by a further two month period. The Data Controller will inform the Data Subject about the extension of the deadline, with concurrent indication of the cause of the delay, within one month of receiving the request.

Where a Data Subject makes the request by electronic means, and unless otherwise requested by the Data Subject, the information must be provided in an electronic form. Where the Data Controller fails to take any measure at the request of the Data Subject, then - without undue delay or within one month of receiving the request at the latest - the Data Controller will inform the Data Subject about the reasons for not taking any measure, and about the right of the Data Subject to lodge a complaint to a competent supervisory authority, and to seek judicial remedy.

The Data Controller provides information about the right the Data Subjects have free of charge. Where the request of the Data Subject is clearly unsubstantiated or is excessive due to its repeated nature, the Data Controller - with due heed to the administrative costs arising from the provision of requested information or guide or taking the requested measure - may charge a reasonable fee or may refuse to take measures in response to the request.

2) The right to lodge complaints and to remedies

Before initiating legal or administrative proceedings, you are kindly requested to send your request or complaint about the processing of your personal data to the Data Controller so that we can investigate and remedy it in a satisfactory manner, or the Data Controller can fulfil your request or claim, if it is justified.

- **The Data Controller**

You may exercise your rights with the Data Controller by using the following means:

a) In case of sending a postal mail, by sending it to this address: 1097 Budapest, Albert Flórián út 10.;
b) In case of sending an e-mail, by sending it to this e-mail address: gdpr@living.hu
c) Or in person at the public offices of the Data Controller.

Data Subjects are herewith informed that if a request submitted by a Data Subject cannot be identified by reason of its form or content as to the purpose of the statement, but at the same time the Data Subject objects to a personal data processing operation by the Controller on the basis of an element of the request, if the Controller cannot identify it by any other means of redress, it will be treated as a complaint.

The Data Controller must 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. The Data Controller shall inform the Data Subject about those recipients if the Data Subject requests it.

Where the Data Subject disagrees with any decision of the Data Controller or where the Data Controller fails to observe the deadline applicable to the Data Controller, the Data Subject may submit a complaint to the following authority (hereinafter: Authority).

❖ **Name of Authority:**

National Authority of Data Protection and Freedom of Information

- www.naih.hu
- e-mail /mailing address, ugyfelszolgalat@naih.hu; 1363 Budapest, Pf.: 9
- Authority: Abbreviated name: NAIH; KR ID: 429616918
- Address: H-1055 Budapest, Falk Miksa utca 9-11.

Data Subjects have the right to lodge a complaint with the Authority if he or she holds the view that the processing of personal data relating to him or her infringes the provisions of the GDPR or that there is a direct risk of a breach of the law relating to the processing of his or her personal data. The Authority performs the investigation free of charge, and the costs are advanced and borne by the Authority No one may suffer any disadvantage on account of the fact that s/he has lodged a complaint with the Authority. The identity of the person having made the report may be disclosed by the Authority only when the procedure would not be possibly conducted without such identification. The identity of the person having made the report may be disclosed by the Authority even when such person so requests and the procedure would not be possibly conducted without such identification.

❖ **Court action**

Data Subjects may resort to court action in case their rights are infringed. By default, such action fall within the jurisdiction of courts as per the registered seat of the Data Controller, and court action may also be instituted at courts as per the residence or place of abode of the Data Subject, at the discretion of the Data Subject concerned. The court of justice conducts the procedure with priority.

Any person having suffered pecuniary or non-pecuniary damage as a result of a breach of the GDPR will be entitled to compensation from the Data Controller or the processors for the damage suffered, in accordance with the rules laid down in the GDPR. If the Data Controller violates the personality rights of a Data Subject by unlawful processing of their personal data or by violating the rules of data security, the Data Subject may seek to receive compensation for injury from the Data Controller. The Data Controller will be exempted from the liability for damage and the obligation to pay compensation for injury, when it can prove that the damage or violation of the personality right of the Data Subject was caused by an unavoidable cause beyond its control, in other words, where it is under no liability for the event having caused the damage. No damages are payable and no grievance award may be claimed to the extent that the damage or the grievance caused by violation of

personality right was caused by the wilful or grossly negligent conduct of the Data Subject.

IX. DATA TRANSMISSION AND DATA PROCESSING

In case of transmission of personal data, such personal data about the Data Subject at the disposal of the Data Controller are transmitted to one (or more) recipient(s) (natural or legal person, public authority, agency or and other entity).

The recipient of data transmission may also include third parties other than the Data Controller, and also other entities within the organisation of the Data Controller.

Data transmission is conditional on the Data Controller having an appropriate legal grounds for the transmission of the data, i.e. the transmission of data may take place on the basis of the Data Subject's consent, in order to comply with a legal obligation, or on one of the additional legal grounds set out in Article 6(1) of the GDPR.

Effective from: 21.09.2026

1) **Data transmission within the Group of Companies**

Pursuant to preamble item 48 of the GDPR, Data Controllers that are part of the Group of Companies have a legitimate interest in transmitting personal data within the Group of Companies for internal administration purposes, including the processing of personal data of clients and employees. The general principles of transmitting personal data are not different even when the recipients of personal data transmission are located in a third country, however, in such a case, the Data Controller provides the adequate level of protection as required in Article 44 of the GDPR by applying the safeguards set forth in Chapter V of the GDPR. The controlling enterprise of the Group of Companies and the controlled companies both have the legitimate interest (as in **Article 6(1)(f) of GDPR**) to transmit personal data within the Group of Companies for internal administrative purposes, including the processing of the personal data of clients, including you, and the employees of the Group of Companies.

Data processing activities as herein described are performed in order to simplify and clarify administration within the Group of Companies. Personal data transmitted within the Group of Companies may be familiarised with only by employees within the member companies of the Group of Companies with the necessary access authorisations necessary for attaining the purpose of data procession.

2) **Data transmission to third countries**

Where the recipients of data transmission are located in a third country, the Data Controller will ensure adequate level of protection as per Article 44 of GDPR, by applying the safeguards set forth in Chapter V of the GDPR, and will provide detailed information about such data transmission by way of the specific data procession notice describing such data procession.

3) **Data processors**

The recipients of data transmission also include data processors employed by the Data Controller. Where data procession is performed by a party on behalf of the Data Controller, the Data Controller may employ a data processor capable of providing adequate guarantees to ensure compliance of data procession with the requirements of GDPR, and which implement the technical and organisational measures for the protection of the rights of the Data Subjects in a verifiable manner. Data processing by the data processor is regulated by the Data Controller under a contract with the data processor or under another legal instrument (e.g. internal regulation).

The name of the data processors involved in the particular data processing activity and the range of data processing activities are described in the guidelines providing information about the particular data processing activity.

For the purposes of monitoring the lawfulness of the data transmission and informing the data subject, the Data Controller shall keep a record of the data transmission, covering the date of the transfer of personal data processed by the Data Controller, the legal grounds and the recipient of the transfer, the scope of the personal data so transmitted and other data specified in the legislation providing for the processing. In the course of the data transmission, the Data Controller will not transmit any data other than the personal data provided voluntarily by the Data Subject to any third party.

X. PERSONAL DATA RELATING TO CHILDREN AND THIRD PARTIES

As regards online services relating to information society, the validity of a legal statement by a minor aged over 16 years is not subject to the consent or subsequent approval of his/her lawful representative (parent). No minor below 16 years of age may provide any personal data about himself/herself, except where she/he has received a consent from his/her lawful representative (parent).

The use of the website is considered by the Data Controller as proper consent having been given by the lawful representative. By virtue of providing the personal data, you represent and warrant that you have acted with due heed to the above, and your capacity to provide personal data and information is not restricted.

Where you do not have the legal right to provide any personal data, you must obtain the consent of the third party concerned (e.g. legal representative, guardian, other person on whose behalf you are acting) or provide another legal grounds for providing the data. In this respect, you must take into consideration whether the consent of a third party is necessary in the context of the provision of the particular personal data, in which case the Data Controller bears no liability. The Data Controller has the right to check whether there are proper grounds for the processing of a personal data, and so the Data Controller has the right to request you produce your authorisation and/or the consent of the Data Subject for proper data processing as regards the particular case, if you act on behalf of a third party.

We make every reasonable effort to erase any and all information that were provided to use unlawfully, and we ensure that this information will not be transmitted to any third party, and will not be used by us either (either for advertising or for other purposes).

Please notify us immediately when you have found that a child has provided any personal data about himself/herself or a third party about you.

XI. MISCELLANEOUS PROVISIONS

The current version of this Statement is posted by the Data Controller on its website living.hu, and it is also available at the registered seat and the public office of the Data Controller.

This Statement, and all content herein is protected by copyright and all related rights are held by the Data Controller, and this content may be used subject to preliminary approval from the Data Controller in writing. By accepting this Statement, the user of the website agrees to use the website ethically, and not for data collection purposes.

This Data Protection Statement is governed by Hungarian law. Matters not regulated herein are primarily governed by the provisions of GDPR and other relevant Hungarian laws.