PRIVACY STATEMENT

Concerning data processing relating to the use of the LIVING mobile application and the direct marketing activities performed using the mobile application

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I. INTRODUCTION

The purpose of this special Data Privacy Statement (hereinafter: **Statement**) is to provide to the Data Subjects transparent and clear information about the data processing activities performed by the Data Controller, covering the preparation, amendment and termination of the real estate sale contract and ancillary documents in accordance with General Data Processing Directive of the European Union no. 2016/679/EU (hereinafter: **GDPR**[1]).

Please note that this Notice only provides detailed information on the circumstances of data processing in connection with the use of the LIVING mobile application and direct marketing activities performed using the mobile application.

Data processing activities not covered in this Statement are governed by the provisions of the *General Data Privacy Statement* as available on the website of the Data Controller (www.living.hu), which is also available at the registered seat and public offices of the Data Controller, together with the special and specific data processing statements covering the particular services and activities. Detailed information on the processing of data by the Data Controllers under Section II./b) is available on the eHÁZ condominium management system operated by the Data Controller.

The LIVING mobile application ensures that its users at their discretion may use the following services via the LIVING mobile application: the primary purpose of the LIVING mobile application is to serve as a communication **channel for communication** between the contracting parties about the conclusion and fulfilment of the sale of real estate and to make available the functions of the **smart home service**. The LIVING mobile application also facilitates users being contacted with marketing messages and, once the condominium is established, ensures that certain matters related to the condominium are handled through the LIVING mobile application by the authorised user.

All the services available through the LIVING mobile application are accessible without the use of the LIVING mobile application, the LIVING mobile application is provided for convenience only, its installation and use is not a condition for accessing the services indicated above. Users may utilize these services independently of the LIVING mobile application.

II. THE DATA CONTROLLER

a) Joint Data Controllers in the LIVING Group of Companies:

Joint Data Controllers in the LIVING Group of Companies:

1) LIVING I. Ingatlanfejlesztő Befektetési Alap (*registered seat*: H-1095 Budapest, Máriássy utca 7.);
2) LIVING II. Ingatlanfejlesztő Befektetési Alap (*registered seat*: H-1095 Budapest, Máriássy utca 7.);
3) LIVING III. Ingatlanfejlesztő Befektetési Alap (*registered seat*: H-1095 Budapest, Máriássy utca 7.);
4) LIVING IV. Ingatlanfejlesztő Befektetési Alap (*registered seat*: H-1095 Budapest, Máriássy utca 7.);
5) LIVING V. Ingatlanfejlesztő Befektetési Alap (*registered seat*: H-1095 Budapest, Máriássy utca 7.);
6) LIVING VII. Ingatlanfejlesztő Befektetési Alap (*registered seat*: H-1095 Budapest, Máriássy utca 7.);
7) PW3 Ingatlanfejlesztő Korlátolt Felelősségű Társaság (*registered seat*: H-1097 Budapest,

Albert Flórián út 10.);
8) LIVING-Szabolcs Kft. *(registered seat:* H-1097 Budapest, Albert Flórián út 10.);
9) ParkWest 2 Kft. *(registered seat:* H-1097 Budapest, Albert Flórián út 10.);
10) V45 Kft. *(registered seat:* H-1097 Budapest, Albert Flórián út 10.);
11) PARK WEST Four Ingatlanfejlesztő Korlátolt Felelősségű Társaság (*registered seat*: 1097 Budapest, Albert Flórián út 10.);
12) **LIVING-Service Kft.** *(registered seat:* H-1097 Budapest, Albert Flórián út 10.*)* – **Data Controller acting as contact person: (gdpr@living.hu);**

hereinafter jointly referred to as: **LIVING Joint Data Controller**s or **Data Controller.**

For detailed information about the LIVING Business Group, in particular the definition of the participating controllers, the legal relationship between the joint controllers, the processing of data related to the Business Group, etc., please refer to the *General Data Processing Notice* available on the Controller's website (https://downloads.living.hu/files/general-privacy-policy.pdf).

i. Data processing relating the use of the LIVING mobile application

The data processing associated with the use of the LIVING mobile application may not always involve a Joint Controller. The responsibilities of the participants are outlined as follows:

- In scenarios where a natural person, acting as a buyer in a real estate sales contract (including registration contract, pre-contract, or final sales contract), is represented by a legal entity, the Project Company, which holds a contractual relationship with the buyer as the seller in the respective project, always serves as the Data Controller (hereinafter: **Project Company**).

- A service and license agreement has been concluded between **Project Company**[2] and **LIVING-Service Kft**. for the **provision of the LIVING mobile applicatio**n. In fulfilling this mandate, LIVING-Service Kft. processes the personal data contained in the LIVING mobile application in the capacity of Data Processor on behalf of the Project Company, acting as Data Controller.

- The smart home service available through the LIVING mobile application is provided by Boston Technologies Ltd. (see VI./2.) as the Data Processor, mandated by the Project Company as the Data Controller.

- LIVING-Service Kft. has entrusted the Data Processor specified in point VI./4. of this Information Notice (BDO Hungary IT Solutions Ltd.) with the development and operation of the LIVING mobile application and the related data processing.

ii. Data processing for direct marketing purposes

In the case of data processing for direct marketing purposes via the LIVING mobile application, the members of the LIVING Enterprise Group shall be considered as joint data controllers until the contract transfer under point II./b. becomes effective. Thereafter, LIVING-Service Kft. shall be considered as an independent controller for the processing for direct marketing purposes, subject to the following condition

[2] *A separate service and license agreement (and related data processing agreement) will be concluded with each project company for the provision of the LIVING mobile application.*

The project companies shall not carry out any data processing activities through the LIVING mobile application after the transfer of the contract.

Regarding data processing related to direct marketing activities, the Data Controllers involved in joint data management use a common database on the LIVING mobile application.

If the Data Subject has given consent in accordance with the applicable data protection regulations (checkbox on the mobile application), LIVING-Service Kft. will contact the Data Subject in the first instance to promote the services of the joint controllers. However, the Project Company with which the Data Subject has a contractual relationship will always contact the Data Subject with direct marketing messages related to a given project. For promoting the special services of LIVING-Service Kft., LIVING-Service Kft. will always contact the Data Subjects via the LIVING mobile application.

Responsibility for fulfilling 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 the data subject wishes to withdraw his or her consent to the processing of their personal data, he or she may do so in the mobile application interface Settings.

The Joint Controllers shall jointly provide information to Data Subjects on direct marketing enquiries in the form of this (joint) Notice.

The Joint Controllers collect the consent to data processing for direct marketing purposes (checkboxes in the mobile application) jointly in the admin interface of the mobile application.

LIVING-Service Ltd. has contracted with the Data Controller specified in Section VI./4. of this Notice to develop and operate the LIVING mobile application and to perform the related data processing operations.

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 laws in relation to and against each of LIVING-Service Kft. and each of the Data Controllers.

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 data:	e-mail:	service@living.hu
	Phone:	+36-1/808-0888

Contact details of the Data Protection Expert:	gdpr@living.hu

The data management relationship of the participants in the joint data management in relation to the LIVING mobile application shall continue until the effective date of the transfer of the contract as set out in point II./b. of this Notice.

After the transfer of the contract, only LIVING-Service Kft., which provides the LIVING mobile application, will assume the role of Data Controller in the data management relationship. From that point forward, the project companies will cease to conduct any data management via the LIVING mobile application.

b) The Condominium

The Project Company, in a contractual relationship with a natural person (acting as the representative of a legal person) who appears as a buyer in a contract for the sale of real estate, pursuant to Section 6:209 (1) of Act V of 2013 on the Civil Code (hereinafter: Civil Code), shall be the contractual partner of both the Project Company and LIVING-Service Kft. Ltd. for the provision of the LIVING mobile application. The Project Company has provided its prior and irrevocable consent to the transfer of all its rights and obligations (contractual position) to the respective Condominium (the community of owners) after the formation and registration of the Condominium and the individual sub-units (real estate) in the Real Estate Register.

The transfer of the contract becomes effective upon notification by LIVING-Service Kft. From this moment onward, the role of the data controller will also change. Starting from the effective date of the contract transfer, Partnership House will assume the position of data controller concerning data processing related to the use of the LIVING mobile application. Meanwhile, LIVING-Service Kft. will take on the role of data controller regarding data processing for direct marketing purposes (see Section II./a)/ii.).

Following the assignment, the respective condominium[3] to which the Project Company has transferred its contractual position will always become the controller. This arrangement will be formalized through a separate agreement between the Project Company and the condominium.

The condominium, acting as the Data Controller, can be reached through the central contact details of the legal/natural person responsible for the common image or through the eHÁZ condominium management system.

For instance, in the scenario where a condominium assumes the role of data controller for a project managed by ParkWest 2 Real Estate Development Ltd., the joint representation is facilitated by NEO Property Services Zrt.

- Registered seat: H-1117 Budapest, Szerémi út 4.;
- Co. reg. number: 01-10-045154
- Tax ID number: 13357371-2-44

[3] *For example when ParkWest 2 Ingatlanfejlesztő Kft., in its capacity as the project company assigns its position in the contract to the Condominium to be established, which is the community of apartment owners.*

III. CIRCUMSTANCES OF DATA PROCESSING BEFORE THE ASSIGNMENT OF CONTRACT[4]

PURPOSE	SUB-PURPOSE	CATEGORIES OF PROCESSED DATA	LEGAL GROUNDS	RETENTION PERIOD
To use the mobile application.	To create a user account (Fibaro ID), to activate the application	Name (family name, surname); e-mail address; activation code; apartment number, list of devices and rooms of the smart home system used, device control authorisation and device status.	The consent of the data subject. [Article 6(1) (a) of GDPR]	Until the withdrawal of consent (= deletion of user account)[5]
	To maintain contact between the contracting parties to ensure communication between them.	Name (family and given name); e-email address, apartment number (project, staircase, apartment).		Until the withdrawal of consent (= deletion of user account)
	To install the smart home service[6] basic package (by he data controller described in Section VI/2 of this Statement).	Name (first name, last name); apartment number; user ID; e-mail address; telephone number; telephone number of designated contact person, e-mail address; Range of persons with access to the service		Until the withdrawal of consent (= deletion of user account)

[4] *Project company (use of LIVING mobile application), Members of the LIVING Group particilating in joint data control (data management for direct marketing purposes) - see this Section Ii/a of Statement*

[5] The user account must be sought by writing to any of the *sevice@living.hu or gdpr@living.hu* email addresses.

[6] *The service provided by the data controller commissioned by the Project Company as per Section VI/2 of this Statement, which is described in detail is accessible here: Smart home solutions*

		(Range of equipment, e.g. Lightning, intercom, they are entitled to use)		
To contact Data Subjects for direct marketing purposes to promote the products and services offered by the joint Data Controllers.		Name (family and given name); e-email address	Consent of the data subject. [Article 6(1) (a) of of GDPR]	To withdraw consent (using the toggle button on settings)
To subsequently verify the lawfulness of maintaining contact with the Data Subject for marketing purposes		Identification data and data relating to the fact, date, method and content of previous communication.	legitimate interest on the part of the Data Controller[7] to enforce its claims under the law and to verify compliance [Article 6(1) (f) of GDPR]	The general period of limitation as per the Civil Code of Hungary - five years - as from the revocation of the consent.
Dispensing with getting into contact with the Data Subject who has withdrawn consent for future processing.		Identifying data and content of the statement withdrawing consent to processing.	Legitimate interest of the Data Controller[8] in refraining from contacting the data subject who has withdrawn consent or refused consent in the future, to avoid possible complaints about unsolicited requests, reputational damage.	From the moment consent is withdrawn until the Controller engages in marketing activities, or until the data subject provides consent for the processing of their personal data for such purposes.

[7] *LIVING-Service Kft.*
[8] *LIVING-Service Kft.*

		[Article 6(1) (f) of GDPR]	
To investigate any complaints or disputes related to the Service and (subsequent) verifying its lawful operation.	Identifying data, contact details, personal data relating to the circumstances of the dispute (e.g.: recorded content of communications with the customer).	The legitimate interest of the Data Controller to settle any complaints or disputes regarding the Service. [Article 6(1) (f) of GDPR]	The general period of limitation as per the Civil Code of Hungary - five years - as from the revocation of the consent.

IV. CIRCUMSTANCES OF DATA PROCESSING AFTER THE ASSIGNMENT OF CONTRACT[9]

PURPOSE	SUB-PURPOSE	CATEGORIES OF PROCESSED DATA	LEGAL GROUNDS	RETENTION PERIOD
To use the mobile application.	Booking community areas and tools.	User name, item to be booked (e.g. living room, tools, etc.); apartment number (name of project)	Consent of the data subject. [Article 6(1) (f) of of GDPR]	Until the withdrawal of consent (= deletion of user account)
	To track the use of the community areas and tools.	User name, item to be reserved (e.g. Living room, tools, etc.), start and end date of reservation, and the period of such reservation and the Item reserved	Legitimate interest on the part of the Data Controller to preserve the condition of he community areas and tools.	

[9] *The Condominium (data processing relating the use of the LIVING mobile application) and LIVING-Service Kft. (Data processing for direct marketing purposes) see Sections Ii/a/ii and Section Ii/b of this Statement*
[10] *Condominium*

		Data relating the receipt and returning (free text), apartment number (name of project)	[Article 6(1) (f) of GDPR]	
	To handle error reports [Condominium, smart home, application, warranty issues not included].	Name (first name, surname); apartment number; free text field to describe the fault.	Consent of the data subject. [Article 6(1) (a) of GDPR]	
	Control of the smart home service [including operation of customer service and support; receiving and handling error reports; logging activity].	Name (first name, surname); apartment number; user ID; e-mail address; telephone number; telephone number of designated contact person, e-mail address; active/inactive status; access scope and changes (e.g. new users, changes in access levels).		
	Remote opening of entrance gates, garages, common areas without the use of keys.	Image and voice conveyed via the video intercom.		
	Communication - condominium mass communication - with Data Subjects.	Name (first name, surname); apartment number; monthly balance.		

	Display of temperature in the area of the apartment registered and selected in the application.	Location data of registered apartment.		
Contacting Data Subjects by direct marketing to promote the products/services of the Data Controller[11].		Name (family and given name); e-email address	Consent of the data subject. [Article 6(1) (a) of GDPR]	To withdraw consent (using the togle button on settings)
To subsequently verify the lawfulness of maintaining contact with the Data Subject for marketing purposes		Identification data and data relating to the fact, date, method and content of previous communication.	Legitimate interest on the part of the Data Controller to enforce its claims under the law and to verify compliance [Article 6(1) (f) of GDPR]	The general period of limitation as per the Civil Code of Hungary - five years - as from the revocation of the consent.
Dispensing with getting into contact with the Data Subject who has withdrawn consent for future processing.		Identifying data and content of the statement whereby the consent to data processing is withdrawn.	Legitimate interest of the Data Controller in refraining to contact the Data Subject in the future who has withdrawn consent or refused consent, to avoid possible complaints about unsolicited enquiries, reputational damage.	From the moment consent is withdrawn until the Data Controller engages in marketing activities, or until the data subject provides consent for the processing of their personal data for such purposes.

[11] *LIVING-Service Kft.*

		[Article 6(1) (f) of GDPR]	
To investigate any complaints or disputes related to the Service and (subsequent) verifying its lawful operation.	Identifying data, contact details, personal data relating to the circumstances of the dispute (e.g.: recorded content of communications with the customer).	The legitimate interest of the Data Controller to settle any complaints or disputes regarding the Service. [Article 6(1) (f) of GDPR]	The general period of limitation as per the Civil Code of Hungary - five years - as from the revocation of the consent.

V. OTHER IMPORTANT INFORMATION ABOUT DATA PROCESSING
FOR THE ABOVE PURPOSES

DATA SUBJECTS INCLUDE:	1) A natural person appearing as the buyer, or the representative of a legal person in a real estate purchase agreement (registration contract, preliminary contract, final purchase contract). 2) The owner of the property (a natural person registered as the owner in the real estate registry, or a natural person authorized to represent a legal p 3) The natural person authorized to use the property (e.g., tenant, family member) under other appropriate legal title.
SOURCE	▪ **Data subject**; ▪ **FIBAR GROUP Spółka Akcyjna** The smart home service may be used by the user if s/he first creates a Fibaro user account (Fibaro ID). Regarding the data processing related to this matter (see: Section III. /1. sub-purpose), FIBAR GROUP Spółka Akcyjna is considered an independent Data Controller. - Contact data: Székhely: Wysogotowo 62-081, Serdeczna 3 street, a Poznan Nowe Miasto és a Poznani. Wilda Körzeti Bíróság nyilvántartásába bevezetve, a Nemzeti Bírósági Nyilvántartás 8. Kereskedelmi Részlegének cégjegyzékszáma: 553265, adószám:NIP 7811858097, alaptőke 1 063 850,00 lengyel zloty, e-mail-cím: dpo@fibaro.com About data processing by FIBAR GROUP Spółka Akcyjna, on the registration page of the LIVING mobile application, and detailed information accessible at: https://www.fibaro.com/us/privacy-policy/

GOOGLE ANALYTICS FOR FIREBASE	The LIVING mobile application uses the Google Firebase software suite developed by Google, which is a development platform for Android and iOS mobile applications (and web applications), i.e. a set of tools and services that help you create mobile applications (and web applications). Google Firebase operates as a Backend-as-a-Service (BaaS) platform, providing a fully-featured, cloud-based backend for mobile applications. The LIVING mobile application uses the following service of Google Firebase: Firebase Analytics. Firebase Analytics operates on a strict policy of non-personal data processing. Their service exclusively handles data in anonymized formats, dedicated solely to statistical analysis. This approach ensures that no inference can be drawn regarding user activity within the mobile application interface. https://firebase.google.com/support/privacy.
ENTIIES WITH RIGHT OF ACCESS	The authorised employees of individual data controllers and data processors (e.g. Project Company, Living Service, data controllers participating in joint data management, Boston Technologies Kft., BDO Hungary IT Solutions Kft., etc.), who may process the data only to the extent strictly necessary for the performance of their tasks.
DELETION OF USER ACCOUNT (withdrawal of consent)	The deletion of the user account and consequently the personal data processed therein from the LIVING mobile application does not imply the deletion of those personal data processed therein, which the data controllers lawfully process for other purposes (on other legal bases) in other databases (e.g., data processed for contractual communication purposes). Personal data processed solely for purposes related to the use of the LIVING mobile application (e.g., activation code) will also be deleted as a result of the deletion of the user account.

VI. DATA TRANSMISSION AND DATA PROCESSING

The personal data so processed may be delivered other persons (data subjects). Data subjects may include public authorities, authorities, or other entities performing public administrative powers and courts to which data are disclosed under a legal obligation (*Article 6(1)(c) of GDPR*). Further information on data transmission is available in the *General Data Privacy Statement*.

The recipient of data transmission may include third party data processing entities who or which handle personal data on behalf of the Data Controller for the purposes specified by such Data Controller under the contract entered into with the Data Controller. The Data Controller resorts to data processing entities who or which provide adequate safeguards for the protection of the personal data.

For data processing in connection with the use of the LIVING mobile application and the direct marketing activities carried out through it, the data controllers use the following Data Controllers.

	THE ACTIVITIES	OF THE DATA CONTROLLER

1.	**LIVING-Service Kft.** (registered seat: H-1097 Budapest, Albert Flórián út 10. Tax ID number: 26733803-2-43; Co. reg. number: 01-09-341840)	The operation of the mobile application on the basis of the data processing agreement concluded with the Project Company and then with the Condominium as a result of the transfer of the contract.
2.	**Boston Technologies Kft.** (registered seat: H-1015 Budapest , Hattyú utca 18. 3. em. 5. ajtó. Tax ID number: 14418321-2-41. Co. reg. number: 01-09-902980)	As a result of the transfer of the contract with the Project Company and the data processing agreement concluded with the Condominium, the deployment and operation of the smart home service, and the provision of general technical support (support, helpdesk activities) related to the LIVING mobile application (not exclusively related to the smart home service).
3.	**BDO Magyarország IT Megoldások Kft.** (registered seat: H-1103 Budapest, Kőér utca 2/A. C. ép. Tax ID number: 13536266-4-42, co. reg. number: 01-09-942171)	Development and operation of the mobile application based on the data processing agreement with LIVING-Service Kft.

VII. THE RIGHTS OF THE DATA SUBJECTS

Pursuant to Articles 15-22 of the GDPR, Data Subjects may:

a) seek access to their personal data;
b) seek rectification of their personal data;
c) seek erasure of their personal data;
d) seek restrictions on the use of their personal data;
e) seek data portability;
f) *object to the processing of their personal data based on the legitimate interest of the Data Controller*;
g) seek to be excluded from the scope of decisions passed exclusively in automated decision-making.

In addition to the above, the date subject may also:

a) *withdraw their consent to the processing of data*, if the processing was based on the prior consent of the Data Subject; and
b) lodge a complaint to the Data Controller in relation to the data processing performed by such Data Controller, and
c) lodge a complaint to the competent supervisory authority or may resort to court.

❖ <u>The right to object</u>

Data Subjects have the right to object, on grounds relating to his or her particular situation, at any time to the processing of his or her personal data on the basis of legitimate interests and to profiling.

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.

Data Subjects may exercise their rights to object by writing an e-mail using the following e-mail address:

- **gdpr@living.hu**
- **on the central contact details of the legal/natural person responsible for the joint representation of the Condominium or on the so-called eHÁZ condominium management system operated by the Condominium.**

❖ Withdrawal of consent to data processing

Data Subjects may withdraw his or her consent to the purposes of this processing at any time, without restriction and without giving reasons, free of charge, as follows.

1) Data processing related to the use of a mobile application: e-mail addresses **sevice@living.hu** or gdpr@living.hu or the central contact details of the legal/natural person responsible for the joint representation of the Condominium or the eHÁZ condominium management system operated by the Condominium (deletion of the user account does not imply deletion of data lawfully processed for other purposes from other databases);
2) data processing for direct marketing purposes: in the **Settings menu o**f the application interface by selecting the **toggle button**

Withdrawal, objection, or modification can be submitted through any means, provided it includes the name of the declarant and sufficient identifying information to uniquely identify the declarant. Even in the absence of such an identification, the declaration will be accepted by the Data Controller if it is received through a communication channel (e.g. e-mail address) previously provided by the data subject to the Data Controller for the purpose of contacting him/her.

The Data Controller does not verify the accuracy, veracity or accuracy of the personal data provided to it. The Data Subject bears sole responsibility for the accuracy and truthfulness of the personal data they provide. When supplying their email address, the Data Subject acknowledges that they are the sole user of the services associated with the provided email address. Consequently, any liabilities arising from access made using the provided email address shall be borne exclusively by the Data Subject who supplied it to the Data Controller.

This section specifically summarizes the special rights granted to individuals concerning the data processing related to the use of the LIVING mobile application

and the direct marketing activities carried out through it. Further information on the additional rights of Data Subjects that may be exercised in connection with the processing and the details of their exercise can be found in the *General Data Processing Notice*, which is available on the Data Controller's website (https://downloads.living.hu/files/general-privacy-policy.pdf). Detailed information on the data processing carried out by the Condominium is available on the eHÁZ condominium management system operated by the Condominium.

VIII. REMEDIES

As set forth in the above Data Privacy Statements, Data Subjects may lodge a complaint in relation to the data processing performed by such Data Controllers.

The Data Controller suggests that Data Subjects first lodge their complaint to the Data Controller before initiating a court action.

Data Subjects may lodge a complaint regarding the processing of their personal data with the National

Authority for Data Protection and Freedom of Information (NAIH - 1055 Budapest, Falk Miksa utca 9-11.; postal address: 1363 Budapest, Pf.: 9.; e-mail: ugyfelszolgalat@naih.hu; phone: +36 (30) 683-5969, +36 (30) 549-6838; +36
(1) 391 1400; Fax: +36 (1) 391-1410), or you may also resort to a court with jurisdiction as per your residence address.

IX. MISCELLANEOUS PROVISIONS

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.

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.

Effective from: 09.21.2026