PRIVACY NOTICE

on the Processing of Personal Data in Connection with Registration for the Customer Portal

I. INTRODUCTION

The purpose of this specific privacy notice (hereinafter: the "Notice") is to provide data subjects with transparent and easily understandable information concerning the processing of their personal data in connection with registration for the Customer Portal, in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council (the "GDPR").

Please note that this Notice provides detailed information exclusively on the specific circumstances of the processing of personal data in connection with registration for the Customer Portal.

With respect to any processing of personal data not addressed in this Notice, the provisions of the General Privacy Notice available on the Controller's website (www.living.hu), as well as at its registered office and business premises, and the specific and individual privacy notices applicable to the relevant services and activities, shall apply.

II. DATA CONTROLLERS

a) (Joint) data controllers belonging to the LIVING Group:

(Joint) data controllers belonging to the LIVING Group:

1) LIVING I. Ingatlanfejlesztő Befektetési Alap (registered office: 1095 Budapest, Máriássy utca 7.);
2) LIVING II. Ingatlanfejlesztő Befektetési Alap (registered office: 1095 Budapest, Máriássy utca 7.);
3) LIVING III. Ingatlanfejlesztő Befektetési Alap (registered office: 1095 Budapest, Máriássy utca 7.);
4) LIVING IV. Ingatlanfejlesztő Befektetési Alap (registered office: 1095 Budapest, Máriássy utca 7.);
5) LIVING V. Ingatlanfejlesztő Befektetési Alap (registered office: 1095 Budapest, Máriássy utca 7.);
6) LIVING VII. Ingatlanfejlesztő Befektetési Alap (registered office: 1095 Budapest, Máriássy utca 7.);
7) PW3 Ingatlanfejlesztő Korlátolt Felelősségű Társaság (registered office: 1097 Budapest, Albert Flórián út 10.);
8) LIVING-Szabolcs Kft. (registered office: 1097 Budapest, Albert Flórián út 10.);
9) ParkWest 2 Kft. (registered office: 1097 Budapest, Albert Flórián út 10.);
10) V45 Kft. (registered office: 1097 Budapest, Albert Flórián út 10.);
11) PARK WEST Four Ingatlanfejlesztő Korlátolt Felelősségű Társaság (registered office: 1097 Budapest, Albert Flórián út 10.);
12) LIVING-Service Kft. (registered office: 1097 Budapest, Albert Flórián út 10.)

-

designated data controller for contact purposes (gdpr@living.hu);

hereinafter jointly referred to as: "LIVING", the "Joint Controllers" or the "Controller".

Detailed information concerning the LIVING Group, including in particular the identification of the participating controllers, the legal relationship between the Joint Controllers, the processing of personal data in connection with the Group, etc., is available in the General Privacy Notice published on the Controller's website (www.living.hu).

Description of the legal relationship between the Joint Controllers belonging to the Group and the material elements of the arrangement concluded between them:

LIVING-Service Kft. has been designated by the Joint Controllers as the point of contact for communication with data subjects.

Website:		www.living.hu
Contact details:	Email:	info@living.hu
	Telephone:	+36-1/808-0888
Data protection expert contact:		gdpr@living.hu

A shared electronic system is used for the processing of personal data collected by the Joint Controllers in connection with the Customer Portal.

Responsibility for fulfilling the obligations arising from the processing of personal data is allocated as follows. LIVING-Service Kft., as the point of contact designated for data subjects, performs the tasks relating to compliance with obligations arising from data protection laws. Data subjects may exercise their rights in connection with the processing of their personal data by submitting a request or complaint to LIVING-Service Kft. (by post to 1097 Budapest, Albert Flórián út 10., or by email to gdpr@living.hu).

If a data subject wishes to withdraw or modify (restrict) the consent given to the processing of personal data, or to object to the processing by post, such request may be submitted in a postal item addressed to LIVING-Service Kft.

The Joint Controllers provide information to data subjects concerning registration for the Customer Portal jointly, in the form of this (joint) Notice.

The allocation of responsibility among the Joint Controllers as described above does not affect the data subjects' right to exercise their rights under data protection law in relation to and against each and every Controller.

III. CIRCUMSTANCES OF THE PROCESSING

PURPOSE	CATEGORIES OF PERSONAL DATA PROCESSED	LEGAL BASIS	RETENTION PERIOD
Creation and maintenance of a user account in connection with the Controller's Customer Portal.	Name, email address, and optionally provided telephone number	Consent of the data subject [Article 6(1)(a) GDPR]	The user accounts created, and consequently the data, shall be retained until deletion is initiated by the data subject. In the case of data subjects who enter into a contract with the Controller (preliminary agreement,

			registration agreement, sale and purchase agreement or lease agreement), the data processed in the Customer Portal shall be retained for the period specified in the privacy notice applicable to the processing of personal data in connection with the relevant contract.

IV. FURTHER IMPORTANT INFORMATION CONCERNING THE PROCESSING FOR THE ABOVE PURPOSES

CATEGORIES OF DATA SUBJECTS	Natural persons registering on the Controller's Customer Portal
SOURCE	The source of the processed data is the data subject
AUTHORISED PERSONS	Employees of the Controllers who have appropriate access rights and may process the data only to the extent strictly necessary for the performance of their duties

V. DATA TRANSFERS AND DATA PROCESSING

PROCESSOR	ACTIVITY
Attention CRM Consulting Kft. (registered office: 1075 Budapest, Madách Imre út 13-14.; tax number: 23350849-2-42)	Provision of IT services relating to the CRM system (customer relationship management system)

VI. DATA SUBJECT RIGHTS

6.1. Right of access / right to information

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:
- the purposes of the processing;
- the categories of personal data concerned;
- the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
- the recipients or categories of recipients to whom the personal data have been or will be disclosed, including in particular recipients in third countries and international organisations. Where personal data are transferred to a third country or an international organisation, the data subject shall have the right to be informed of the appropriate safeguards relating to the transfer as required by the GDPR;
- any available information as to their source, where the personal data are not collected from the data subject;
- the data subject's right to request from the Controller rectification or erasure of personal data or restriction of processing concerning the data subject, or to object to such processing;

- the right to lodge a complaint with a supervisory authority;
- the existence of automated decision-making, including profiling, and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.

The Controller shall provide the data subject with a copy of the personal data undergoing processing. For any further copies requested by the data subject, the Controller may charge a reasonable fee based on administrative costs. Where the data subject has submitted the request electronically, the information shall be provided in a commonly used electronic form, unless otherwise requested by the data subject.

6.2. Right to rectification

At the request of the data subject, the Controller shall rectify inaccurate personal data concerning the data subject without undue delay. Taking into account the purposes of the processing, the data subject may also request the completion of incomplete personal data.

6.3. Right to restriction of processing

At the request of the data subject, the Controller shall restrict processing where one of the following conditions applies:
- the personal data are no longer needed by the Controller for the purposes of the processing, but are required by the data subject for the establishment, exercise or defence of legal claims;
- the processing is unlawful and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
- the data subject contests the accuracy of the personal data; in this case, the restriction shall apply for the period enabling the Controller to verify the accuracy of the personal data;
- the data subject has objected to the processing; in this case, the restriction shall apply for the period necessary to determine whether the Controller's legitimate grounds override those of the data subject.

Where processing has been restricted, such personal data, with the exception of storage, shall only be processed:
- with the data subject's consent;
- for reasons of important public interest of the Union or of a Member State;
- for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person.

Where the restriction of processing is lifted, the Controller shall inform the data subject who requested the restriction thereof in advance.

6.4. Right to erasure

At the request of the data subject, the Controller shall erase personal data concerning the data subject without undue delay. In addition, the Controller shall erase personal data concerning the data subject without undue delay where the conditions set out in the GDPR apply.

Where the Controller has made the personal data public and is obliged to erase the personal data as described above, taking account of available technology and the cost of implementation, it shall take reasonable steps, including technical measures, to inform other controllers processing the personal data that the data subject has requested the erasure by such controllers of any links to, or copy or replication of, those personal data.

Personal data must not be erased where the processing is:
- necessary for compliance with a legal obligation under Union or Member State law which requires processing of personal data;
- necessary for the establishment, exercise or defence of legal claims (e.g. where the data are required as evidence in judicial proceedings);
- necessary for exercising the right of freedom of expression and information;
- necessary for archiving purposes in the public interest, scientific or historical research purposes or

statistical purposes, where erasure would render impossible or seriously impair the achievement of that processing.

6.5. Right to data portability

The data subject shall have the right to:

- receive the personal data concerning him or her, which he or she has provided to a Controller, in a structured, commonly used and machine-readable format, and:
- transmit those data to another controller without hindrance from the 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.
- request the direct transmission of personal data from one Controller to another, where technically feasible.

6.6. Rights relating to automated processing

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. This right applies to the data subject by virtue of the law and its exercise is not conditional upon the submission of a request.

Automated processing may therefore only be used where it:
- is based on the data subject's explicit consent;
- is necessary for entering into, or performance of, a contract between the data subject and the Controller; or
- is authorised by Union or Member State law applicable to the Controller.

In the first two cases, the Controller shall implement suitable measures to safeguard the data subject's rights, freedoms and legitimate interests, including at least the data subject's right to:
- express his or her point of view;
- contest the decision; and
- obtain human intervention on the part of the Controller.

In the above cases, decisions may not be based on special categories of personal data, except where explicit consent or substantial public interest applies, and only where suitable measures have been taken to safeguard the data subject's rights, freedoms and legitimate interests.

6.7. Right to an effective remedy

Every data subject shall have the right to lodge a complaint with a supervisory authority, in particular in the Member State of his or her habitual residence, place of work or the place of the alleged infringement, if the processing of personal data concerning him or her infringes the GDPR.
Complaints and other remedies may be pursued using the following contact details: Name: Hungarian National Authority for Data Protection and Freedom of Information
Postal address: 1363 Budapest,
P.O. Box 9, 1363 Budapest,
Hungary. Email:
ugyfelszolgalat@naih.hu.
Website: www.naih.hu

In addition, the data subject shall have the right to seek judicial remedy and may bring proceedings against the Controller if, in the data subject's opinion, the Controller or a processor engaged by or acting on the Controller's instructions processes the data subject's personal data in breach of the requirements laid down in legislation governing the processing of personal data or in binding legal acts of the European Union. The court shall hear the case as a matter of priority. Proceedings shall fall within the jurisdiction of the regional court (törvényszék). At the data subject's option, proceedings may also be

brought before the regional court of the data subject's domicile or place of residence, or the registered office of the Controller.

Effective as of: 21 September 2026