

PRIVACY STATEMENT

Regarding the processing of data in connection with access to and stay on the construction site

The purpose of this privacy statement (hereinafter: **Statement**) is to provide a transparent and easily understandable information for the data subjects *regarding the processing of data in connection with access to and stay on the construction site* in accordance with the provisions of the General Data Protection Regulation (2016//79/EU) (hereinafter: **GDPR**¹).

With regard to the data processing activities not mentioned in this Statement, the provisions of the *General Data Processing Statement* on the Data Controller's website (www.living.hu/en) - and also available at its headquarters and business premises – and the provisions of the *Privacy Statement about the data processing activities relating the preparation, amendment and termination of the real estate preliminary contract and the related documents* shall apply.

I) THE DATA CONTROLLER

The Joint Data Controllers in the LIVING Group of Companies (hereinafter: **Data Controller**)

- ✓ listing of the Joint Data Controllers: <https://downloads.living.hu/files/general-privacy-policy.pdf>;
- ✓ designated Data Controller for contact purposes: *LIVING-Service Kft.* (registered seat: 1095 Budapest, Máriássy utca 7.);
- ✓ website: www.living.hu;
- ✓ contact: info@living.hu;
- ✓ contact details of the data protection associate: gdpr@living.hu

Detailed information about the LIVING Group of Companies - in particular the identification of the participating data controllers, the legal relationship between the joint data controllers, the processing of data related to the group of companies, etc. - are available in the *General Data Processing Statement* on the Data Controller's website (<https://downloads.living.hu/files/general-privacy-policy.pdf>).

II) CIRCUMSTANCES OF THE PROCESSING OF DATA

PURPOSE	CATEGORIES OF THE PROCESSED DATA	LEGAL BASIS	PERIOD OF RETENTION
To support the protection of property and other assets, and the protection of human life and health, and to collect evidence related to civil claims using video surveillance.	The personal data on the camera recording data (e.g.: image), the data deduced from the recordings regarding the data subject and the time and place when the recording was made.	The Data Controller's legitimate interest in the protection of property (protection of property against burglary, theft or damage) and the prevention of crime against the person. [Article 6 (1) (f) of GDPR]	30 days from the date of the camera recording.
Retrievable identification of the person involved in the walk-through/technical handover to support the protection of property and other assets and the protection of human life and health.	Personal data required to participate in the walk-through/technical handover (e.g.: personal identification, contact details).	The Data Controller's legitimate interest in the protection of property (protection of property against burglary, theft or damage) and the prevention of crime against the person. [Article 6 (1) (f) of GDPR]	After the personal data has been recorded for a maximum period of time during which a claim for compensation may arise (up to 6 months).

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.

III) FURTHER IMPORTANT INFORMATION

- 1) The camera system only records still images (every 15 minutes between 05:00 and 20:00), no sound recording is made. The images recorded by the camera system are available on the Data Controller's website on the webcam subsection of each residential complex (<https://living.hu/en/residential-parks>). The Data Controller has taken the necessary technical and organisational measures to ensure that only those camera recordings are public with which the data subjects cannot be identified. The camera recordings may later be made into a "time lapse video" to promote the activities of the Data Controller, but these recordings will not include data subjects in an identifiable manner.
- 2) Scope of data subjects:
 - ✓ natural persons over the age of 18 participating in the walk-through/technical handover,
 - ✓ accompanying person,
 - ✓ all natural persons in the camera's field of view: participants in the walk-through/technical handover, accompanying person, persons on the construction site (contractor's employees, Data Controller's employees).
- 3) People authorised to access the personal data:
 - ✓ Authorised employees of the Data Controller who may process the data only to the extent strictly necessary for the performance of their tasks.
- 4) Data transmission and processors:
 - ✓ There is no transfer of personal data to third parties and the Data Controller does not employ a processor for these processing activities.
- 5) Rights and remedies of the data subject:
 - a) The data subject shall enjoy all the rights under Articles 12 to 22 of the GDPR, in particular with regard to the current processing:
 - ✓ the data subject has the right to object to the processing of his or her personal data carried out for the legitimate interests of the Controller
 - b) Further rights of the data subject:
 - ✓ to lodge a complaint with the Data Controller (at gdpr@living.hu or at 1095 Budapest, Máriássy utca 7.) or
 - ✓ to lodge a complaint with the supervisory authority (Nemzeti Adatvédelmi és Információszabadság Hatóság; 1055 Budapest, Falk Miksa utca 9-11.; 1363 Budapest, Pf.: 9.; ugyfelszolgalat@naih.hu) or to go to court.

This chapter specifically summarizes the rights of the data subject in relation to *the processing of data in connection with access to and stay on the construction site*. Other data subjects' rights that may be exercised in connection with data processing and details of how to exercise them can be found in the *General Data Processing Statement* and the *Privacy Statement about the data processing activities relating the preparation, amendment and termination of the real estate preliminary contract and the related documents* which are available on the Data Controller's website (<https://downloads.living.hu/files/general-privacy-policy.pdf>).

The rules of Hungarian law apply to this Statement. In matters not covered by this Statement the provisions of GDPR and other Hungarian legal acts shall be governing.