

## DATA PRIVACY NOTICE

### About data processing in connection with cookies used on this website

The LIVING Group of Companies as joint data controllers (hereinafter collectively referred to as: **LIVING, Joint Data Controllers** or **Data Controller**) operate the website [www.living.hu](http://www.living.hu) (hereinafter referred to as: **Website** or **Site**) as part of their activities. The Controller uses cookies to maintain and improve the services of the Website and to enhance the user experience. The use of cookies entails the processing of personal data of visitors to the Website (hereinafter referred to as " **Data Subject**"), whereby LIVING - the Website operator - acts as an independent data controller, and accordingly, pursuant to Articles 13 and 14 (1) to (2) of the GDPR<sup>1</sup>, provides the following information to Data Subjects.

This privacy notice (hereinafter the " **Notice**") provides detailed information only on the processing of data in connection with the cookies used on the Website, and detailed information on other processing carried out by the Data Controller can be found at the Controller's website (<https://living.hu/en/landing/privacy-policy>).

### I) DATA CONTROLLER'S DATA

#### 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-095 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) PW3 Ingatlanfejlesztő Korlátolt Felelősségű Társaság (*Registered seat: H-1095 Budapest, Máriássy utca 7.;*
- 6) "LIVING-Szabolcs Kft." (*Registered seat: H-1095 Budapest, Máriássy utca 7.;*
- 7) "ParkWest 2 Kft." (*Registered seat: H-1095 Budapest, Máriássy utca 7.;*
- 8) "V45 Kft." (*Registered seat: H-1095 Budapest, Máriássy utca 7.;*
- 9) **LIVING-Service Kft.** (*Registered seat: H-1095 Budapest, Máriássy utca 7.;* data controller acting as contact person: ([gdpr@living.hu](mailto:gdpr@living.hu));

Detailed information about the Joint Controllers - in particular the definition of the participating controllers, the legal relationship between the Joint Controllers, and data processing in relation to the LIVING Group of Companies - can be found in the *General Data Processing Statement* available on the Controller's website (<https://downloads.living.hu/files/general-privacy-policy.pdf>).

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<sup>1</sup> Regulation (EU) 2016/679 of the European Parliament and the Council on the protection of natural persons with regard to the processing of personal data and the free movement of such data, and repealing Directive 95/46/EC.

**b) 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-1095 Budapest, Máriássy utca 7.) to keep contact with Data Subjects.

Website:		<a href="http://www.living.hu">www.living.hu</a>
Contact data:	e-mail:	<a href="mailto:info@living.hu">info@living.hu</a>
	Phone:	+36 70 705 23 69
Contact details of the Data Protection Expert:		<a href="mailto:gdpr@living.hu">gdpr@living.hu</a>

The processing of personal data collected in relation to the cookies used on the Website is performed by shared electronic systems.

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 (acting also as the supervisory entity). Data Subjects may exercise the rights they 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-1095 Budapest, Máriássy utca 7., or by email to its email address [gdpr@living.hu](mailto:gdpr@living.hu)).

If the data subject wishes to withdraw, modify (restrict), or object to the processing of their personal data based on consent, they may do so by sending a written request to LIVING-Service Kft. at the provided postal address.

The Joint Data Controllers provide the information relating to cookies used on the Website jointly to the Data subjects as set forth in this joint Statement.

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 the Data Controllers.

## **II) CIRCUMSTANCES OF PROCESSING**

### **1. What is a Cookie?**

Cookies (http cookies) are small packets of information in the form of text files consisting of simple letters and numbers. When visiting the Site, the web server sends a cookie to the web browser, which stores it in a separate directory on the Data Subject's device (e.g., laptop, tablet, smartphone, or any web-browsing device). Therefore, cookies are stored by the Data Subject's web browser (downloaded from the Website) on any device used by the Data Subject. The Data Controller may use these cookies, for example, to identify the Data Subject on subsequent visits, distinguish the Data Subject from others, and offer personalized information.

## 2. How to Prevent Cookies from Being Installed on Your Device or Delete Cookies

Data Subjects have the option to set the cookies used on the Website through the cookie manager available on the Website. In the cookie manager, Data Subjects can select which types of cookies they consent to, which they do not consent to, and can modify their previous consent (e.g., withdraw consent).

Additionally, most web browsers (e.g., Google Chrome, Mozilla Firefox, Internet Explorer, Microsoft Edge, Opera, Safari) accept cookies by default. However, with the appropriate browser settings, Data Subjects can refuse, restrict, or disable cookies, and delete cookies stored during previous visits. The browser provider offers detailed instructions on these settings, typically available in the "help" section.

Below are instructions for deleting cookies in the most popular browsers and accessing key cookie settings:

### ❖ **Google Chrome:**

Open the browser, click on "Google Chrome personalization and settings," then select "Privacy & Security" from the "Settings" menu. From there, Data Subjects can delete individual cookies and change cookie settings.

For more details, visit Google Support.

[Delete, allow and manage cookies in Chrome - Android - Google Chrome Help](#)

### ❖ **Mozilla Firefox:**

Open the browser, click "Settings" under the "Applications menu" icon, then go to "Privacy & Security" to change cookie settings and delete individual cookies.

For more details, visit

[Clear cookies and website data for a single domain in Firefox for Android | Firefox for Android Help](#)

### ❖ **Microsoft Edge:**

Open the browser, click the "Settings and other options" icon in the top-right corner, go to "Settings," then click on "Cookies and site permissions" and "Manage and delete cookies and site data." From this interface, Data Subjects can adjust cookie settings and delete individual cookies.

For more details, visit

[Clear cookies and website data for a single domain in Firefox for Android | Firefox for Android Help](#)

### ❖ **Safari:**

Open the browser in the Safari app on your Mac, select "Safari," then "Preferences," and click "Manage website data" under "Privacy." From there, Data Subjects can remove specific websites or all stored data.

For more details, visit [Clear the history, cache, and cookies from Safari on your iPhone, iPad, or iPod touch - Apple Support](#).

## 3. What Happens if the Data Subject Does Not Consent to the Installation of Cookies, Deletes Cookies, or Objects to Them?

Refusing to consent to the installation of cookies, deleting cookies, or objecting to them will not generally prevent you from visiting or browsing the Website. However, certain cookies essential for the functionality of the Website may be affected. These essential cookies ensure the availability, display, and usability of the Website, so disabling them or deleting previously installed cookies could result in reduced functionality or unusable features on the Website.

#### **4. What Cookies Are Used by the Website?**

##### **4.1 Categories of Cookies Used by the Website:**

###### **a) Essential Cookies for Website Functionality (Necessary)**

The use of these cookies is essential for the proper functioning of the Website. Without these cookies, it is not possible to navigate the Website, nor can the content be served (including the use of secure protocols). This category includes session cookies, which are used by the Data Controller to track user (Data Subject) data input (cookies that store data entered by the Data Subject). While Data Subjects can disable these cookies in their browser settings, doing so may prevent them from being able to use the Website.

Examples of cookies that are essential for the functioning of the Website include:

*test\_cookie: Tests if the browser supports cookie handling. Expiry: 1 day.*

*l.gif: Tracks the number of visits (sessions). Expiry: End of session.*

*CookieConsent: Stores the state of the cookie settings. Expiry: 1 year.*

*SESS#: Stores user preferences between page loads. Expiry: End of session.*

###### **b) Functional (Operational) Cookies**

These cookies enhance the user experience by simplifying the use of the Website, improving the operation of certain functions, and making the Website more convenient and useful for both the Data Controller and the Data Subject. For example, they allow the Data Controller to store certain preferences or choices made by the Data Subjects (e.g., selected language, adjusted font size), enabling the Data Controller to tailor the Website to meet the needs of the Data Subjects (users). While the Website will still function without these cookies, certain features and functionalities may not be available.

Functional (operational) cookies used on the website:

*lang: Remembers the User's preference for the language settings. Expiry: End of session.*

###### **c) Analytical (Performance) Cookies**

These cookies collect data about the Data Subject's behavior on the Website to analyze how it is used (e.g., most visited pages, error messages encountered). These cookies are typically set by third parties (e.g., Hotjar, Google).

Examples of analytical cookies:

*\_hjSession\_#:* Collects statistics on website visits, such as visit duration and pages viewed. Expiry: 1 day.

*\_hjSessionUser\_#:* Collects statistical information on visitors' sessions, such as the number of visits, average time spent, and pages viewed. Expiry: 1 year

*hjViewportId:* Saves screen size for image adjustments. Expiry: End of session.

*\_ga:* Generates a unique identifier to collect information about how the visitor uses the website. Expiry: 2 years.

*ga#:* Used by Google Analytics to collect information about the number of times a user has visited the website and the dates of their first and last visits. Expiry: 2 years.

#### **d) Advertising Cookies (Targeted Ads)**

These cookies are set by third parties (e.g., Facebook, Google) and enable targeted advertising based on user behavior. By using these cookies, the Data Controller can create behavioral profiles to serve ads based on Data Subjects' interests.

Examples of advertising cookies include:

*\_fbp:* Used by Facebook to provide an advertising product from third-party advertisers. Expiry: 3 months.

*pagead/landing:* Tracks the conversion rate between the user and the banner ads on the website. This is used to optimise the relevance of the ads on the website. Expiry: End of the session.

*\_gcl\_au:* Google uses AdSense to test the advertising effectiveness of websites that use its services. Expiry: 3 months

*#-#:* Tracks user interaction with embedded content. Expiry: End of the session.

*iU5q-!O9@\$:* Generates a unique identifier to track which YouTube videos the user has viewed. Expiry: End of the session.

**4.2** In addition to the four categories of cookies previously discussed, cookies can also be classified based on who installs them on the Data Subject's device. Cookies can be placed on the Data Subject's web browsing device not only by the Data Controller operating the Website, but also by third parties independent of the Data Controller. These types of cookies (external cookies) enable various functionalities, such as sharing content via social networks (e.g., cookies installed by Facebook). Thus, we can distinguish between:

- a) **Internal cookies** used by the Data Controller as the operator of the Website.
- b) **External cookies** installed by third parties independent of the Data Controller<sup>2</sup>.

These external cookies are placed on the Website by third parties other than the Data Controller. If the Data Controller incorporates elements from other websites on the Website (e.g., embedded content),

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<sup>2</sup> They are not strictly necessary for the user to visit (and use) the website, as these cookies are usually linked to a service that is separate from the one for which the user visited the website.

these third-party cookies are installed on the Data Subject's device when the Website is accessed. For example, cookies may be set by platforms like Meta or Google. These third parties may gather information about the Data Subject's browsing behavior on the visited Website. In such cases, the Website serves as an intermediary, and only the third party placing the cookie has access to the information stored in and transmitted by the cookie. The Data Controller does not have access to the information stored by these external cookies.

## **5) Purpose of the Processing**

*Cookies essential for the operation (necessary)* of the Website are used to ensure appropriate accessibility and presentation for Data Subjects (visitors), prevent data loss (e.g., session cookies), and maintain a suitable level of security during visits.

*Functional cookies* aim to enhance the user experience by personalizing certain features of the site (such as recording visit history) and making navigation easier.

The purpose of *analytical (performance) cookies* is to provide Data Subjects with a better browsing experience and to improve the Data Controller's services. These cookies collect data, statistics, and useful information about the Website's usage (including specific functions), enabling the Data Controller (or third parties, if they install the cookies) to analyze user behavior. Analytical cookies also allow the Data Controller to link a visitor's current browsing session with their previous sessions. By comparing browsing histories and analyzing browsing habits, the Data Controller can refine its services to enhance the user experience while maintaining the anonymity of Data Subjects.

*Cookies used for advertising* (targeting advertisements) aim to display personalized marketing content and ads tailored to the visitor's preferences.

## **6) Scope of Data Processed**

By installing and reading cookies, the Data Controller processes personal data of the Data Subjects (visitors) related to their use of the Website. This includes, but is not limited to, processing online identifiers such as IP addresses and cookie identifiers provided by devices, tools, and protocols associated with the Data Subjects. These identifiers can be used to uniquely identify Data Subjects.

**Exceptions:** Analytical (performance) cookies, which are installed to process (store, read) data in an anonymous form, are not subject to GDPR provisions (Recital 26 of GDPR).

## **7) Legal Basis for Processing**

Subject to Article 155 (4) of Act C of 2003 on Electronic Communications, the legal basis for processing personal data through cookies is Article 6(1)(a) of the GDPR, which pertains to the consent of the Data Subject (visitor) for all types of cookies that are not essential for the Website's functionality (including functional, analytical, and advertising cookies).

For cookies that are essential for the proper functioning of the Website, the legal basis for processing is the legitimate (economic) interest of the Controller in providing the Website and the services it offers to its visitors (Data Subjects), as stipulated by Article 6(1)(f) of the GDPR.

## **8) Duration of Processing**

Cookies are categorized based on their duration as either temporary (session) cookies or permanent (persistent) cookies.

Temporary cookies are valid only for the duration of the Data Subject's current session and are automatically deleted from the web browsing device when the browser is closed. Persistent cookies, on the other hand, enable websites to retain the user's (Data Subject's) browsing preferences and habits for future visits. These cookies remain on the Data Subject's device for a set period (e.g., 3 months) or until manually deleted by the Data Subject.

The use of session cookies, which are installed by the Data Controller and are essential for the operation of the Website, aims to prevent data loss. These cookies are typically temporary and are deleted once the session ends (i.e., when the browser is closed). In contrast, cookies such as functional (operational) or analytical (performance) cookies, which enhance the user experience by remembering user preferences for future visits, remain on the device for a predefined period of time and are not deleted automatically until that period has expired.

### **9) Data Transfers (Data Processors, Third-Party Recipients), Transfers to Third Countries**

In addition to the Data Controller, the following third-party recipients have access to the personal data processed by cookies:

- ❖ **Google LLC** ([Cookie Policy](#))
- ❖ **Facebook Inc.** ([Cookie Policy](#))
- ❖ **LinkedIn Corporation** ([Cookie Policy](#))

When third parties place cookies, the personal data contained in these cookies may be transferred outside the European Economic Area (EEA). Detailed information about the data processing activities of these third parties is available through the provided links.

### **III) CATEGORIES OF DATA SUBJECTS**

- **Natural persons** visiting the Website (visitors, users).

### **IV) ACCESS TO DATA**

- Personal data may be accessed only by the data processors identified in this Notice and by employees of the Data Controller.

### **V) DATA SUBJECT RIGHTS**

This Notice specifically addresses the data subject rights related to the processing of personal data via cookies. Further information about the rights of Data Subjects can be found *in the General Data Processing Notice* available on the Controller's website ([www.living.hu](http://www.living.hu)).

	Preliminary information	Access	Rectification	Erasure	Restriction	Data portability	Objection	Withdrawal of consent
Consent	✓	✓	✓	✓	✓	✓	✗	✓
Agreement	✓	✓	✓	✓	✓	✓	✗	✗
Legal obligation	✓	✓	✓	✗	✓	✗	✗	✗
Vital interest	✓	✓	✓	✓	✓	✗	✗	✗
Public duty, authority	✓	✓	✓	✗	✓	✗	✓	✗
Legitimate interest	✓	✓	✓	✓	✓	✗	✓	✗

### 1) Right to Withdraw Consent (Article 7 of GDPR)

The Data Subject has the right to withdraw consent to the processing of personal data at any time. The withdrawal of consent does not affect the lawfulness of the processing based on consent prior to its withdrawal.

The Data Subject may withdraw consent either by using the cookie manager on the Website or by sending an email to [gdpr@living.hu](mailto:gdpr@living.hu).

### 2) Right to Object (Article 21 of GDPR)

The Data Subject has the right to object, at any time and on grounds related to his or her particular situation, to the processing of personal data based on legitimate interests, including profiling.

In such a case, the Data Controller may only continue to process the personal data if it can demonstrate compelling legitimate grounds for the processing that override the interests, rights, and freedoms of the Data Subject, or for the establishment, exercise, or defense of legal claims.

If the Data Subject objects to the processing of his or her personal data, the Data Controller will restrict processing for the necessary period to allow the Data Controller to demonstrate that its legitimate grounds override those of the Data Subject.



The Data Controller specifically draws the attention of the Data Subjects to this right of objection within the context of this Notice.

The right to object can be exercised by the Data Subject through the cookie manager on the Website or by sending an email to [gdpr@living.hu](mailto:gdpr@living.hu).

### **3) How and Where Can the Data Subject Request Detailed Information on the Processing and Transfer of Data, and Exercise Their Rights?**

In case of a complaint regarding the processing of personal data, we recommend that the Data Subject first lodge a complaint with the Data Controller before initiating any official or judicial proceedings. The Data Subject can exercise their rights by contacting the Data Controller through the following channels:

- **Postal mail:** 1095 Budapest, Máriássy utca 7.; LIVING-Service Kft.
- **Email:** [info@living.hu](mailto:info@living.hu) and [gdpr@living.hu](mailto:gdpr@living.hu)
- **In person:** at the offices of the Data Controller during opening hours
- **Phone:** +36 70 705 23 69

### **4) Possibility to Enforce Your Rights Before Public Authorities and Courts**

- **National Authority for Data Protection and Freedom of Information**  
Correspondence Address: 1363 Budapest, PO Box 9  
Phone: +36 (1) 391-1400  
Fax: +36 (1) 391-1410  
Website: [www.naih.hu](http://www.naih.hu)  
Email: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)

For further information on the rights of the Data Subject and how to lodge a complaint with the Authority, please visit: <https://www.naih.hu/hatosag-eljarasai>.

- The Data Subject may also bring an action before the competent court in their place of residence in the event of a breach of their rights and claim, among other remedies, damages.