PRIVACY STATEMENT

about data processing in relation to the contract of agency relating the lease and management of the property

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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]).

II. THE DATA CONTROLLER

Name:	**LIVING-Service Kft.**
Registered seat:	H-1095 Budapest, Máriássy utca 7.
Co. reg. number:	01-09-341840
Tax ID number:	26733803-2-43
Contact data:	info@livinghomes.hu; +36 70 705 23 69
Website:	www.livinghomes.hu
Data Protection Officer Contact data:	gdpr@livinghomes.hu

Please be informed that 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., is available in the General Data Privacy Statement available on the Data Controller's website (https://livinghomes.hu/hu/adatkezelesi-tajekoztato)

This Statement provides detailed information about the circumstances of data processing performe in relationo the agency contract on the lease and maintenance of the property only.

Data processing activities not mentioned in this Statement are governed by the provisions of the General Data Privacy Statement as posted on the website of the Data Controller (www.livinghomes.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.

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[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. CIRCUMSTANCES OF DATA PROCESSING RELATING TO THE CONTRACT OF AGENCY
CONCERING THE LEASE OF PROPERTY

PURPOSE	CATEGORIES OF PROCESSED DATA	LEGAL GROUNDS	DATA SUBJECTS INCLUDE:	RETENTION PERIOD
To identify the Data Subject	Identification data (e.g. birth name, place and date of birth, mother's name, address), personal ID card number	To fulfil the terms of the contract. [Article 6 (1)(b) of GDPR]	Natural persons having entered into contract with the Data Controller (hereinafter: **Client**).	Until the termination of contract, and then for eight years after the termination of contract as per Article 169 (1)-(2) of the Accounting Act.
To draft the contract to be concluded by the Parties and the fulfilment of the contract.	Identificatio n data (e.g. birth name, place and date of birth, mother's name, address), signature, employment position entitling the holder to act as representati ve	Legitimate interest on the part of the Data Controller to ensure the fulfilment of the contract. [Article 6 (1)(f) of GDPR]	Representative of legal persons having entered into a contract with the Data Controller (hereinafter: **Representative**)	Until the termination of contract, and then for eight years after the termination of contract as per Article 169 (1)-(2) of the Accounting Act.
To maintain contact between the contracting parties to ensure communication between them.	Contact data (e.g. mailing address: e-mail address)	To fulfil the terms of the contract. [Article 6 (1)(b) of GDPR]	Principal	Until the termination of contract.

To maintain contact between the Parties to the Contract.	Contact data (e.g. e-mail address)	Legitimate interest on the part of the Data Controller to ensure appropriate communication and administration for the purposes of the contract. [Article 6 (1)(f) of GDPR]	Representative	Until the termination of contract.
Compliance with the obligation to ascertain the identity of the client as set forth in the Act LIII of 2017 on the prevention and combating money laundering and terrorism financing.	Categories of data set forth in Articles 7-11 of the Pmt Act	To ensure compliance with the legal obligation set forth in Articles 7-11 of the Pmt Act [Article 6 (1)(c) of GDPR]	Natural person client, aen, person with the right of disposal, representative authorised to act, actual owner.	Eight years as from the termination of the contract, and ten years in cases defined in the Pmt Act (Articles 56-59 of Pmt).
To maintain contact between the Parties to the Contract.	Identification data, contact data (e.g. e-mail address)	Legitimate interest on the part of the Data Controller to ensure appropriate communication and administration for the purposes of the contract. [Article 6 (1)(f) of GDPR]	Natural persons named as contact persons other than the signatory	Until the termination of contract, and then for eight years after the termination of contract as per Article 169 (1)-(2) of the Accounting Act.
Appropriate settlement of the relations between the contracting parties (claims under the contract) after the termination of contract.	Personal data on the contract and related documents.	The legitimate interest of the Data Controller in the establishment, exercise and defence of its legal claims arising out of the contractual relationship. [Article 6 (1)(f) of GDPR]	Clien, Represenative, natural persons named as contact persons other than the signatory	Until the end of the general statutory limitation as per Act V of 2013 on the Civil Code (5 years) after the termination of contract.

To ensure that the lease contract or any of its amendment complies with the formal requirements (inclusion in a private document with full probative force).	Identification data (name, address) signature	It is the legitimate interest on the part of the Data Controller to verify with full probative force that the signatory of the contract has taken the statement therein included, and accepted and agreed to be bound by the same, until otherwise proven.	Witness	Until the termination of lease contract, and then for eight years after the termination of contract as per Article 169 (1)-(2) of the Accounting Act.
		kötelezőnek ismerte el. [Article 6 (1)(f) of GDPR]		

IV. CIRCUMSTANCES OF DATA PROCESSING RELATING TO THE CONTRACT FOR THE MANAGEMENT OF THE PROPERTY

PURPOSE	CATEGORIES OF PROCESSED DATA	LEGAL GROUNDS	DATA SUBJECTS INCLUDE:	RETENTION PERIOD
To identify the Data Subject.	Identification data (e.g. birth name, place and date of birth, mother's name, address), personal ID card number	To fulfil the terms of the contract. [Article 6 (1)(b) of GDPR]	Principal	Until the termination of contract, and then for eight years after the termination of contract as per Article 169 (1)-(2) of the Accounting Act.

To draft the contract to be concluded by the Parties and the fulfilment of the contract.	Identification data (e.g. birth name, place and date of birth, mother's name, address), signature, employment position entitling the holder to act as representative	Legitimate interest on the part of the Data Controller to ensure the fulfilment of the contract. [Article 6 (1)(f) of GDPR]	Representative	Until the termination of contract, and then for eight years after the termination of contract as per Article 169 (1)-(2) of the Accounting Act.
To maintain contact between the contracting parties to ensure communication between them.	Contact data (e.g. phone number, mailing address: e-mail address)	To fulfil the terms of the contract. [Article 6 (1)(b) of GDPR]	Principal	Until the termination of contract.
To maintain contact between the Parties to the Contract.	Contact data (e.g. e-mail address)	Legitimate interest on the part of the Data Controller to ensure appropriate communication and administration for the purposes of the contract. [Article 6 (1)(f) of GDPR]	Representative	Until the termination of contract.
To ensure that the obligation to pay the rent and ancillary charges on the part of the lessee having entered into a contract with the Client	Identification data (name); name of bank; bank account number.	To fulfil the terms of the contract. [Article 6 (1)(b) of GDPR]	Principal	Until the termination of contract, and then for eight years after the termination of contract as per Article 169 (1)-(2) of the Accounting Act.
To ensure that the Data Controller may act on behalf of and in representation of the Client in providing the service relating the management of the property.	Personal data as on the power of attorney (e.g. Identification data)	To fulfil the terms of the contract. [Article 6 (1)(b) of GDPR]	Principal	Until the termination of contract, and then for eight years after the termination of contract as per Article 169 (1)-(2) of the Accounting Act.

To maintain contact between the Parties to the Contract.	Identification data, contact data (e.g. e-mail address)	Legitimate interest on the part of the Data Controller to ensure appropriate communication and administration for the purposes of the contract. [Article 6 (1)(f) of GDPR]	Natural persons named as contact persons, other than signatories.	Until the termination of contract, and then for eight years after the termination of contract as per Article 169 (1)-(2) of the Accounting Act.
the relations of the parties under the contract (claims under the contract) after the temination of contract	Personal data on the contract and related documents.	The legitimate interest on the part of the Data Controller	Client, representative, contact persons other than signatory	Until the end of the general limitation period (5 years) from the termination of contract as set forth in
Appropriate settlement of		in submitting and enforcing its claims under the contract [Article 6 (1)(f) of GDPR]	natural persons	Act V of 2013 on the Civil Code of Hungary.
To ensure that the lease contract or any amendment to it complies with the formal requirements (inclusion in a private document with full probative force).	Identification data (name, address) signature	It is the legitimate interest on the part of the Data Controller to verify with full probative force that the signatory of the contract has taken the statement therein included, and accepted and agreed to be bound by the same, until otherwise proven. [Article 6 (1)(f) of GDPR]	Witness	Until the termination of lease contract, and then for eight years after the termination of contract as per Article 169 (1)-(2) of the Accounting Act.

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

DATA SUBJECTS INCLUDE:	▪ Data Subjects having entered into a contract with the Data Controller (Client); ▪ Data Subjects having not entered into a contract with the Data Controller (Representative, natural persons named as contact persons other than the signatory, witness).
SOURCE OF DATA	▪ **Data Subject** (as regards data relating to them); ▪ In the case of data relating to the natural persons named as contact persons other than the signatory, the Client Where the Data Subjects are not the source of the personal data relating to them, the Controller shall, within a reasonable period of time from the date of obtaining the data and in any event within one month at the latest, ensure that the obligation of information is fulfilled in accordance with Article 14(3) of the GDPR.
PERSONS WITH A RIGHT TO ACCESS DATA	Employees of LIVING with authorisation to use the perosnal data to the extent it is absolutely necessary in performing their duties.

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.

The Data Controller uses the services of the data controllers to perform the tasks herein stated.

THE ACTIVITIES	OF THE DATA CONTROLLER
CollabIT Zrt. *(registered seat: H-1119 Budapest, Nagyenyed utca 77/C; company reg. number: 01-10-140165)*	To operate the SharePoint system for the storage of personal data. (in relation to the contract of agency relating the lease and management of the property).
WING Ingatlanfejlesztő és Beruházó Zártkörűen Működő Részvénytársaság *(registered seat: H-1095 Budapest, Máriássy utca 7.; Co. reg. number: 01-10-042336)*	To operate the system for the storage of personal data (in relation to the contract of agency on the lease of property)
NEO Property Services Zrt. *(registered seat: H-1095 Budapest, Máriássy utca 7.; Co. reg. number: 01-10-045154)*	To complete the tasks to be done in relation to the property lease service (e.g making repairs) in relation to the contract of agency on the management of property)

The Data Controller transmits no personal daat to any third party in relation to the contract of agency coverin the lease and management of the property

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) lodge a complaint to the Data Controller in relation to the data processing performed by such Data Controller, and
b) lodge a complaint to the competent supervisory authority or may resort to court.

This chapter specifically summarises the specific rights of Data Subjects in relation to the processing of data relating to a preliminary contract for the sale of real estate. Further information on the additional Data Subject rights that may be exercised in the context of data processing and the details of their exercise can be found in the General Data Privacy Statement, which is available on the website of the Data Controller (https://livinghomes.hu/hu/adatkezelesi-tajekoztato).

VIII. REMEDIES

As set forth in the General Data Privacy Statement, Data Subjects may lodge a complaint in relation to the data processing performed by such Data Controller.

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.