

Data processing notice

1. Name of data processor:

Name: INTERGAL-GEOS Marina Project Korlátolt Felelősségű Társaság (hereinafter referred to as “Data Controller”, “INTERGAL-GEOS”, “Company”)
Registered address: 1092 Budapest, Ráday utca 57. 1. em. 7. ajtó
Company registration number: Cg. 01-09-406649
Name of the court of registration: Court of Registration of the Regional Court of Budapest
Tax number: 32101100-2-43
E-mail: info@geosgrouphungary.com

2. Purpose, legal basis and method of processing, scope of data processed and duration of storage, persons entitled to access the data:

2.1. Recruitment and selection

Purpose of the data processing: To select the right prospective employee from among the applicants for the jobs advertised by INTERGAL-GEOS.

Scope of data processed: name, telephone number, e-mail address, professional experience, CV.

Legal basis for the processing: Your consent under Article 6(1)(a) of the GDPR.

Duration of processing: The data you provided will be processed by INTERGAL-GEOS until the vacancy is filled.

Method of processing: on paper and electronically.

Persons entitled to access the data: Recruitment and selection specialists of the controller.

Purpose of processing: In the case of applicants for non-specific jobs, to register the applications received by INTERGAL-GEOS for filling vacancies with a view to the subsequent establishment of an employment relationship, and to select the suitable prospective employee.

Scope of data processed: name, telephone number, e-mail address, professional experience, CV.

Legal basis for the processing: Your consent under Article 6(1)(a) of the GDPR.

Duration of processing: The data you provided will be processed by INTERGAL-GEOS until the vacancy is filled.

Method of processing: on paper and electronically.

Persons entitled to access the data: Recruitment and selection specialists of the controller.

2.2. Processing for sale

Purpose of processing: To contact for the purpose of selling or renting real estate.

Scope of the data processed: Personal data to be provided on the website: name, e-mail address, telephone number, comment; database: name, telephone number, e-mail address, place and date of birth, nationality; the background database includes: the advertising platform(s) from which he/she has learned about the activities of the Controller, which property the data subject liked, what are his/her preferences regarding real estate purchase, the fact of making an offer. Customer tracking in the CRM system.

Legal basis for the processing: Consent under Article 6(1) (a) of the GDPR.

Duration of data processing: Until the consent is withdrawn.

Method of processing: on paper and electronically.

Persons entitled to access the data: sales staff of the Controller.

2.3. Contracting

Purpose of processing: Contracting for the rental and sale of real estate and other purposes.

Scope of data processed: Name, birth name, place of birth, date of birth, mother’s birth name, nationality, copy of identification document and its number and type, copy of official residence card and its number, address or, in its absence, place of stay/address for notification, bank account number.

Legal basis for the processing: The performance of the contract pursuant to Article 6(1)(b) of the GDPR and the performance of a legal obligation under Article 6(1)(c) of the GDPR according to the customer identification obligation set forth in Sections 6(1) and 7 of Act LIII of 2017 on the Prevention and Combating of Money Laundering and Terrorist Financing (“**Pmt.**”) and the obligation to keep accounting records pursuant to Sections 169(2)-(3) of Act C of 2000 on Accounting (“**Szvtv.**”).

Duration of processing: Pursuant to Sections 56(2) and 57(2)-(3) of the Pmt., the Controller is entitled to process the personal data obtained for a period of eight years from the termination of the business relationship or the completion of the transaction. By derogation from the above, the data may be kept for a maximum period of ten years from the termination of the business relationship or the completion of the transaction under Section 58(1) of the Pmt. The data shall be kept for at least 8 years from the date of their creation under Sections 169(2)-(3) of the Szvtv.

Method of processing: on paper and electronically.

Persons entitled to access the data: sales staff of the Controller.

2.3. Data of contractual contact persons

Purpose of processing: To fulfil the Company’s obligations and enforce its rights under contracts, to maintain contact with the contracted partner in order to fulfil the contract, and to comply with the statutory and legal data reporting obligations arising from the contractual relationship.

Scope of data processed: name, position, e-mail address, telephone number

Legal basis for the processing: in the case of employees: Article 6(1)(b) of the GDPR (performance of contractual obligation) and Section 10(1) of the Labor Code and, in respect of the data of the contact person of the contracted partner, the legitimate interest of the contracting party as a third party under Article 6(1)(f) of the GDPR. The Controller has a legitimate interest in the unhindered performance of the contract.

Duration of processing: 5 years from the date of termination of the contract.

Method of processing: on paper and electronically.

2.5. Processing related to newsletter

Purpose of processing: sending electronic newsletters by INTERGAL-GEOS to interested parties, informing them about current information, services and offers concerning the Company.

Scope of data processed: name, username, e-mail address.

Legal basis for the processing: Consent under Article 6(1) (a) of the GDPR.

Duration of processing: until the user unsubscribes from the newsletter.

Method of processing: electronically.

Persons entitled to access the data: staff of the Controller engaged in marketing and sales.

2.6. Processing related to audio recordings

Purpose of processing: complaint handling and quality assurance.

Scope of data processed: voice recording, identification number: calendar day in question + the last three digits of the telephone number of the data subject.

Legal basis for the processing: Consent under Article 6(1) (a) of the GDPR.

Duration of processing: in the case of sales calls, 3 years from the recorded call.

Method of processing: electronically.

Persons entitled to access the data: staff of the Controller engaged in the investigation of complaints.

2.7. Processing related to complaint handling

Purpose of processing: recording, investigating and handling complaints.

Scope of processed data: name of the customer; his/her address, postal address; place, time and manner of lodging the complaint; detailed description of the customer's complaint; unique identification number in the case of data recorded by telephone; documents and other evidence presented by the customer and a list thereof; signature of the person drawing up the minutes and of the customer making the oral complaint in person; place, time and date of drawing up the minutes, e-mail address and telephone number for contacting the customer; data of the person in charge; data of witnesses.

Legal basis for the processing: Consent pursuant to Article 6(1)(a) of the GDPR and, pursuant to Article 6(1)(c) of the GDPR, Section 17/A of the Consumer Protection Act.

Duration of processing: in accordance with Section 17/A(7) of the Consumer Protection Act, the Company shall keep the minutes of the complaint, a copy of the response and the audio recording with a unique identification number for three years.

Method of processing: on paper and electronically.

Persons entitled to access the data: staff of the Controller engaged in the investigation of complaints.

2.8. Processing related to the website

The Website uses so-called cookies. Cookies are small files used to store specific information about the devices (e.g., computer, smartphone) used for browsing. The information contained in the cookies is used for advertising and statistical purposes, as well as to tailor the Website to individual needs. You can change the cookie setting in your browser. If the settings remain unchanged, the cookies are saved on the device. Changing the cookie settings may limit the functionality of the Website.

Facebook link: The Website contains a Facebook link (Meta Platforms Ireland Limited (formerly, Facebook Inc.), 4 Grand Canal Square Grand Canal Harbour Dublin 2 Ireland), which is indicated by a Facebook logo prominently displayed on the Website, which can be clicked on to directly access the Website's Facebook profile. Facebook will then know immediately that the Website has been accessed from your IP address. If you visit the Website when you are logged in to your Facebook profile, Facebook will record your visit. Even if you are not logged in, Facebook will still obtain information about your IP address. For information on data protection issues related to Facebook, please contact Facebook directly or examine Facebook's Privacy Policy at the <https://www.facebook.com/about/privacy/> link.

Instagram link: The Website also uses plugins from the social network Instagram (Meta Platforms Ireland Limited, 4 Grand Canal Square Grand Canal Harbour Dublin 2, Ireland). The Instagram plugin is marked with the "Instagram" button on the Website.

If you click on the "Instagram" button when logged into your Instagram account, you can link the content of the Website to your Instagram profile. More information can be found in the Instagram Privacy Policy at <http://instagram.com/about/legal/privacy/>.

YouTube link: The Website also uses plugins from YouTube (Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland). The YouTube plugin is marked with the "YouTube" button on the Website.

More information can be found in YouTube's privacy policy at <https://policies.google.com/privacy>.

Google Analytics data protection policy: The Website uses the analytics engine of the Google Inc. web service. Google Analytics, Google Double Click and Google Tag Manager. Google Analytics, Google Double Click and Google Tag Manager use cookies to analyze the use of the Website. The information collected by cookies is stored and archived on a Google server.

If you enable IP anonymization when using the Website, your IP address will be abbreviated by Google. This applies to European Union Member States and other countries listed in the Agreement on the European Economic Area. Only in special cases does the full IP address reach Google's US server, where it is then

abbreviated. With this in mind, IP address anonymization is active on the Website. Google uses the information collected to evaluate your use of the Website and compile reports on the use of the Website and other services relating to Internet usage. The IP address provided by the user's browser is not stored in Google Analytics together with other Google data.

Purpose of processing: to study the website visiting habits.

Scope of data processed: Internet Protocol (IP) address of the visitor, time of the visit, pages viewed, name of the browser program used.

Legal basis for the processing: Consent under Article 6(1) (a) of the GDPR.

Duration of processing: the duration indicated for each cookie on the Website.

Method of processing: electronically.

Persons entitled to access the data: marketing staff of the Controller.

2.9. Processing data related to advertisements

The Controller uses the online advertising program "Google Ads" and, within its framework, it also uses Google's conversion tracking service. Google conversion tracking is an analytic service of Google Ireland Limited Google (Gordon House, Barrow Street Dublin 4, Ireland; "Google"). When you reach a website through a Google ad, a cookie necessary to track conversions is placed on your computer. The validity of these cookies is limited. When the User browses certain pages of the Website and the cookie has not expired, Google and the Controller can see that the User has clicked on the advertisement. Each Google Ads customer receives a different cookie, so they cannot be tracked through the websites of the clients of Ads. The information obtained through the use of conversion tracking cookies is used to prepare conversion statistics to Ads customers who opt for conversion tracking. Customers are then informed about the number of users who click on their ad and are redirected to a page with a conversion tracking tag. If you do not wish to participate in conversion tracking, you can opt out by disabling the option to install cookies in your browser. You will then not be included in the conversion tracking statistics. More information and Google's data protection statement can be found at google.de/policies/privacy/

"Google lead" allows the Controller to measure and optimize pre-sales channel events and to tag events more clearly. Based on serious inquirers and converted leads, the Controller can pinpoint the most promising potential customers generated by Google using the offline conversion data and determine the actions to take with respect to those potential customers based on its own conversion process.

The Controller uses the advertising systems of Facebook and Instagram and uses the META-Pixel solution within the framework thereof. Facebook and Instagram ads are a service provided by Meta Platforms Ireland Limited (4 Grand Canal Square, Dublin, Ireland). When a User visits the website of the Controller, a cookie is placed on his/her computer after consent. The validity of these cookies is limited. When the User browses certain pages of the Website and the cookie has not expired, Facebook, Instagram and the Controller can see that the User has visited the website and the pages he/she has viewed. Each visitor receives a different Facebook and Instagram cookie. The information obtained by the Controller by means of the Facebook and Instagram cookies is used to publish ads more accurately to the website visitors and to obtain conversion information through them. If you do not wish to be involved in this, you can opt out by disabling the option to install cookies in your browser. You will then not be included in the visit and conversion tracking statistics. Through the cookie installed by META-Pixel, the Controller also collects events about the visitors of the website after their explicit consent such as visits to the site. If a website visitor withdraws his/her consent to the operation of META-Pixels, the associated cookies will be deleted from his/her browser after the page is reloaded. In Facebook and Instagram, you can change your own advertising settings via this link: <https://www.facebook.com/ads/preferences> and www.instagram.com. You can find Facebook's data protection information here: <https://www.facebook.com/privacy>. www.instagram.com/privacy

Purpose of processing: advertising activities carried out by the Controller.

Legal basis for the processing: consent under Article 6(1) (a) of the GDPR.

Scope of processed data: IP address of the data subject, websites visited, preferences.

Duration of processing: according to the information on the Website or until the consent is withdrawn or the cookies are deleted.

3. Information on the use of data processor:

Based on a service contract: DONE Digital Korlátolt Felelősségű Társaság
Registered address: 1095 Budapest, Gát utca 21. Fsz. 1. ajtó
Company registration number: Cg. 01-09-977186
Name of the court of registration: Court of Registration of the Regional Court of Budapest
Tax number: 23766866-2-43

The Processor processes the data processed pursuant to Clause 2 for the period indicated in Clause 2 and develops the website based on the contract concluded with the Controller.

Based on a service contract: OPENNETWORKS Kereskedelmi és Szolgáltató Korlátolt Felelősségű Társaság
Registered address: 1117 Budapest, Fehérvári út 50-52. 2. em.
Company registration number: Cg. 01-09-723926
Name of the court of registration: Court of Registration of the Regional Court of Budapest
Tax number: 13213343-2-43

The Processor processes the data processed pursuant to Clause 2 for the period indicated in Clause 2, and makes and stores the audio recordings based on the contract concluded with the Controller.

Based on a service contract: Tárhely.Eu Korlátolt Felelősségű Társaság
Registered address: 1144 Budapest, Ormánság utca 4. X. em. 241. ajtó
Company registration number: Cg. 01-09-909968
Name of the court of registration: Court of Registration of the Regional Court of Budapest
Tax number: 14571332-2-42

The Processor processes the data processed pursuant to Clause 2 for the period indicated in Clause 2 and provides web hosting and server services based on the contract concluded with the Controller.

Other processor:

- Meta Platforms Ireland Limited, 4 Grand Canal Square Grand Canal Harbour Dublin 2, Ireland;
- Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland;
- Companies of "GEOS Group Hungary".

4. Information on data security measures:

Method of storing the data. Security of processing:

- The Controller takes, with the assistance of the Processor, technical and organizational measures:
 - a) that are necessary for the application(s) to function properly;
 - b) to ensure that authorized users have access to the application's functions and the data according to their level of authorization;
 - c) to ensure that the data is backed up and archived;
- To comply with the procedural rules necessary to enforce the requirements of the data protection legislation set out in Clause 6. Stored files are subject to virus checks and other security screening by the Controller through the Processor.
- The Controller ensures the security of data processing by technical, organizational and institutional measures to provide a level of protection appropriate to the risks associated with the processing, by choosing and operating the information technology tools used in such a way that:
 - a) the data processed is accessible to authorized persons (availability);
 - b) the authenticity and verification of the processed data are ensured (authenticity of processing);
 - c) it can be verified that the processed data is unchanged (data integrity);
 - d) the data processed be accessible only by the authorized person and protected against unauthorized access (data confidentiality).

5. Rights and legal remedies of data subjects:

1. Right to request information

You may request information from the Controller in writing via the contact details provided, request the rectification or erasure of your personal data, or request the restriction of processing.

Upon your request, the Controller will provide you with information about the data it processes, the purposes, legal basis and duration of the processing, the name and address (registered office) of the controller, the name and address (registered office) of the processor and its activities in relation to the processing, the contact details of the data protection officer, as well as who is receiving or has received your personal data and for what purposes, and your rights in relation to the processing and the measures taken by the Controller. The Controller must provide the requested information in writing and in a comprehensible form as soon as practicable, but no later than 1 month from the day the request is submitted. That period may be extended by two further months where necessary, taking into account the complexity and number of the requests. If the request for information is unfounded or excessive, in particular, because of its repetitive nature, the Controller may charge a fee or refuse to act on the request.

2. Right to withdraw consent

Where to the processing by processing is based on Article GDPR 6(1)(a) and Article 9(1)(a) of the GDPR, you may withdraw your consent to the processing at any time but such a withdrawal will not affect the lawfulness of processing based on the consent before its withdrawal.

3. Right of access

You have the right to receive feedback from the Controller on whether your personal data is being processed. Under the right of access, you have the right to receive access to the personal data relating to the ongoing processing and the following information:

- Purpose of the processing,
- Categories of the personal data concerned,

- Duration of the processing,
- Who is receiving or has received your personal data and for what purposes,
- Your rights related to processing,

- The right to submit complaints addressed to the supervisory authority.

At your request, the Controller will provide you with a copy of the personal data processed, provided, that it does not adversely affect the rights and freedoms of others. The Controller may charge you a fee for any additional copies you request.

4. Modification (rectification) and erasure of data

You may request in writing, via the contact details provided, that inaccurate personal data concerning you be modified (rectified) or that incomplete personal data be completed.

You may request in writing, via the contact details provided, the erasure of your personal data if the purpose of the processing has ceased; in the case of Articles 6(1)(a) and 9(1)(a) of the GDPR (consent), if the data subject withdraws his/her consent; in the case of processing in accordance with Article 6(1)(e) (public interest, official authority) and (f) (legitimate interest) of the GDPR if the data subject objects to the processing or if the processing of the data is unlawful or if the specified period for storing the data has expired or if so ordered by a court or official authority.

The Controller will notify you and all other persons to whom it has transmitted the data for processing of the rectification or erasure. It will ignore the notice if it does not violate your legitimate interests in view of the purpose of the processing.

The Controller will not delete the personal data if they are necessary for the fulfillment of a legal obligation to which the Controller is subject or for the establishment, exercise or defense of legal claims.

5. Restriction of processing

You may request in writing, via the contact details provided, that the Controller restricts the processing of your personal data in so far as:

- you contest the accuracy of the personal data (in this case, the restriction applies for the period enabling the Controller to verify the correctness of the data);
- the processing is unlawful and you oppose their erasure and demand the restriction of their use instead;
- the purpose of the processing has ceased, but you need the data to establish, exercise or defend legal claims.

The restriction lasts as long as rendered necessary by the reason you indicated. In the case of restriction, the personal data will be processed, except for storage, only with your consent, or for the establishment, exercise or defense of legal claims, or for the protection of the rights of another natural or legal person or for reasons of important public interest. The Controller will inform you in advance of the lifting of the restriction at your request.

6. Right to data portability

In the case of processing pursuant to Articles 6(1)(a) and 9(1)(a) (consent) or 6(1)(b) (contract) of the GDPR and where the processing is automated, you may request in writing, via the contact details provided, that your personal data be provided to you in a structured, commonly used, machine-readable format and transmitted to another controller. You also have the right to request to have your data transmitted directly from one controller to another, where technically feasible.

7. Right to object

In the case of processing pursuant to Article 6(1)(e) (public interest, official authority) and (f) (legitimate interest) of the GDPR, you may object in writing to the processing of your personal data (including profiling) via the contact details provided, in which case the Controller will no longer process your data and will erase them.

The Controller may continue to process your personal data if the processing is justified by compelling legitimate grounds and the data is necessary for the establishment, exercise or defense of legal claims.

You may object in writing, via the contact details provided, to the processing of your personal data for direct

marketing purposes (including profiling), in which case the Controller will no longer process your data and will erase it.

8. Legal remedies

In the event of a violation of your rights or if you disagree with the decision of the Controller, you may lodge a complaint with the National

Authority for Data Protection and Freedom of Information:

Name: Nemzeti Adatvédelmi és Információszabadság Hatóság (National Authority for Data Protection and Freedom of Information)

Registered office and postal address: 1055 Budapest, Falk Miksa utca 9-11. / 1363 Budapest, Pf.: 9.

Telephone: (+36-1) 391-1400

Facsimile: (+36-1) 391-1410

E-mail: ugyfelszolgalat@naih.hu

In the event of a violation of your rights or if you disagree with the decision of the Controller, you may, within 30 days of its notification, seek redress directly against the Controller before the courts in the place where the Controller has its registered office or in the place where you reside or are domiciled. The court will hear such cases in priority proceedings.

If you have any comments or objections about the processing of your personal data or would like to request information about the processing of your data, you can do so by using the contact details set out in Clause 1.