

Purpose of data handling	Legal basis for data handling	Scope of data processed	Duration of data handling and rights of access
<p>Provision of apartment house management activities by Cordia FM.</p> <p>Included in this, Cordia FM particularly: (i) proposes a residents association representative, (ii) carries out tasks related to management of the apartment house, (iii) organizes operational and maintenance tasks as defined in the contracts signed with apartment houses, (iv) manages and inspects planned renovations, and (v) develops proposals for the financial management of the apartment house and use of commonly owned parts of the building. Operational tasks are tasks defined in the contract signed with a given apartment house under the heading of apartment house management.</p>	<p>Act CXXXIII. of 2003 on Apartment Houses, § 52. Law on the Civil Code, Act V. of 2013 (“Ptk.”) § 6:272. [Contract of Services]</p> <p>GDPR Article 6, (1) f) – data handling is necessary for the enforcement of your legitimate interests, as well as those of Cordia FM and the apartment house. Legitimate interest is the contractual provision of apartment house management activities by Cordia FM. Data management is a prerequisite for fulfillment of adequate apartment house management activities. Data handling does not have any other consequences, but lacking data Cordia FM cannot perform its apartment house management activities.</p>	<p>Personal information about residents and guests acquired by Cordia FM during provision of apartment house management activities. For example: resident requests, messages and other data related to operation, maintenance and remote monitoring tasks provided by residents, as well as data appearing in the apartment house's financial and economic materials (for example, bill payments), as well as video recordings made inside the apartment house. For the video recordings, the security guard service provider acts as data processor.</p>	<p>Cordia FM will delete the relevant data related to apartment house management 5 years after the termination of a contract or the signature of such a contract falling through, based on Ptk § 6:22. For meeting tax obligations: the data retention period is 5 years from the last day of the calendar year in which the tax should have been declared or included in the tax return and should have been paid if the tax return was missing (Art. 78. § (3), 202. § (1)). If we are obligated to keep the data based on Section 169 of the Accounting Act, the data will be deleted after 8 years following the termination of the relationship. In practice, such cases are where the data is part of the supporting documentation for accounting activities, such as documents associated with conclusion of a contract (in some cases in the agreement itself) or are listed on the invoice. Persons with data access within Cordia FM: The Cordia FM manager, as well as persons overseeing tasks related to property leasing, brokering and other activities.</p>

<p>Provision of property rental, real estate brokerage and other services (furnishing, accountant mediation, etc.) related to the property management service conducted by Cordia FM. You can find more information (including details on the scope of services) on the website.</p>	<p>Ptk. § 6:272. [Contract of Services]. Cordia FM contracts directly with the property owner as a landlord or user of property management services. Ptk. § 6: 331 [Rental Contract]. Acting on behalf of the owner of the property, Cordia FM prepares the lease, and manages the tenant's data. GDPR Article 6, (1) b) – processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract. Data management is a prerequisite for fulfillment of any contract related to property brokerage or property management activities. Data handling does not have any other consequences, but lacking data Cordia FM cannot perform its property handling activities.</p>	<p>Information entered into the Rental, Furnishing and Real Estate Management registration interface for Cordia Management Kft/Cordia Agent Kft common data processor: name, e-mail address, telephone number, how many room apartment you are looking for, status of your subscription to our newsletter, where you heard about the Cordia group of companies, and any other data or messages which you provide during the preparation of an offer for rental, furnishing and real estate management services, and during contract preparation. Providing the data is a prerequisite for the sending of the offer, and the preparation, fulfillment and conclusion of the agreement. Cordia FM on one hand handles the data provided by the tenant for the preparation of the rental agreement – for example, the tenant's personal information that appears in the rental agreement (identity card number, residence card number, passport number, home address, mother's name, telephone number, bank account number.) On the other hand, Cordia FM manages all data provided by the applicant property seeker and prospective tenant provided through the contact methods (telephone, e-mail, inperson customer service) given in service advertisements (Facebook, Instagram, other social media platforms, real estate advertisement sites, print media) related to property management,</p>	<p>Cordia FM will delete the relevant data 5 years after the termination of a lease, intermediary or other type of contract, or the signature of such a contract falling through, based on Ptk § 6:22. If we are obligated to keep the data based on Section 169 of Act C of 2000 on Accounting (“Accounting Act”), the data will be deleted after 8 years following the termination of the relationship. In practice, such cases are where the data is part of the supporting documentation for accounting activities, such as documents associated with conclusion of a contract (in some cases in the agreement itself) or are listed on the invoice. Persons with data access within Cordia FM: The Cordia FM manager, as well as persons overseeing tasks related to property leasing, brokering and other activities.</p>
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<p>Carrying out of residents association representative activities related to the handling of issues for the apartment houses' community of coowners by Cordia FM.</p> <p>Such tasks, for example, preparation and implementation of resolutions made by the apartment house assembly, measures to ensure the maintenance of the building (signing of service provider and other agreements – utility services, water, electricity, chimneys, garbage collection, cleaning, etc. troubleshooting), collection and recovery of common costs and other service fees, and maintaining contact with the apartment house manager.</p>	<p>Law on Apartment Houses § 27 (2) Ptk. § 6:272. [Contract of Services] GDPR Article 6, (1) f – data handling is necessary for the enforcement of your legitimate interests, as well as those of Cordia FM and the apartment house. Legitimate interest is the contractual provision of apartment house management activities by Cordia FM. Data management is a prerequisite for fulfillment of adequate apartment house management activities. Data handling does not have any other consequences, but lacking data Cordia FM cannot perform its apartment house management activities.</p>	<p>Personal information about residents and guests acquired by Cordia FM during provision of apartment house management activities. For example: resident requests, messages and data related to other tasks provided by residents, as well as data appearing in the apartment house's financial and economic materials (for example, bill payments).</p>	<p>Cordia FM will delete the relevant data related to residents association representative activities 5 years after the termination of a lease, or the signature of such a contract falling through, based on Ptk § 6:22.</p> <p>For meeting tax obligations: the data retention period is 5 years from the last day of the calendar year in which the tax should have been declared or included in the tax return and should have been paid if the tax return was missing (Art. 78. § (3), 202. § (1)).</p> <p>If we are obligated to keep the data based on Section 169 of Act C of 2000 on Accounting (“Accounting Act”), the data will be deleted after 8 years following the termination of the relationship. In practice, such cases are where the data is part of the supporting documentation for accounting activities, such as documents associated with conclusion of a contract (in some cases in the agreement itself) or are listed on the invoice. Persons with data access within Cordia FM: The Cordia FM manager, as well as persons overseeing tasks related to property leasing, brokering and other activities.</p>

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<p>Carrying out customer due diligence measures in mediation of commercial real estate leasing rights.</p>	<p>Article 6 (1) (c) of the GDPR (processing is necessary for compliance with a legal obligation to which Cordia as controller is subject). The data subject is not obliged to provide these data, but lacking data, Cordia FM is unable to meet its legal obligations and cannot contact the Client.</p> <p>Cordia FM conducts actions related to real estate transactions as defined by § 3 point 17 of Act LIII of 2017 (“Pmt.”) on prevention and combating of money laundering and the financing of terrorism: the commercial mediation of real estate leasing rights and property ownership. The scope of Pmt. covers Cordia FM on the basis of Pmt. Point f) of Paragraph 1 § (1), while carrying out the requirement of customer due diligence is mandatory according to Pmt. Paragraph 6 § (1). Cordia FM is required to apply customer due diligence measures at the time of establishing a commercial relationship (as well as when executing a commercial mandate, in the event of data, facts or</p>	<p>Cordia FM is required to identify and conduct an identity verification check on the client, the client's authorized representative, the authorized acting agent and, in the case of a non-natural person, their representative, as well as, if such exists, the actual owner as specified in Pmt § 3 point 38. Cordia FM is required to record data defined in Pmt. § 7-9, and is also obliged to require the presentation of the documents specified in these sections, and to prepare copies of them. If enhanced customer due diligence is necessary according to Pmt. § 16, then Cordia FM is required to act with regard to the client and persons defined above according to the personal identification mechanism defined in Pmt. § 17-19. In addition to the aforementioned, Cordia FM is required to request a statement on whether the actual owner, if one exists as defined by the Pmt. referred to above, is considered to be a prominent public figure. If so, the statement must state that the actual owner is considered to be a prominent public figure based on a point from Paragraph (2) of Pmt. § 4. Cordia FM is required to record data defined in Pmt. § 10 as regards the commercial relationship. Based on Pmt. § 12, the client is required during the entirety of the existence of a</p>	<p>Data: Cordia FM, pursuant to Pmt. § 56, is authorized to handle personal information obtained while conducting required customer due diligence for eight years from the termination of the commercial relationship or from the date of execution of the commercial mandate, and is required to preserve data obtained while conducting required customer due diligence that do not constitute personal data, including data obtained during electronic identification, as well as all other data generated in connection with the commercial relationship, for eight years from the termination of the commercial relationship or from the date of execution of the commercial mandate.</p> <p>Documents: Similarly to the above, Cordia FM is required to preserve documents obtained while conducting required customer due diligence and copies of those documents (including documents obtained during electronic identification and during the execution of the notification and the data service in accordance with Pmt. § 42, documents certifying the suspension of the transaction in accordance with Pmt. 34. § and 35. § and copies thereof, as well as all other documents generated in connection with the commercial relationship and copies thereof) for eight years from the</p>

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	<p>circumstances indicating money laundering or financing of terrorism, and if doubts arise on the authenticity or adequacy of previously established customer identification data.) Within the framework of customer due diligence measures, Cordia FM, beyond the data defined by Pmt., is required to record the circumstances of the commercial relationship, and is authorized to request information related to the origins of funds and supporting documentation.</p>	<p>commercial relationship to inform Cordia FM within five working days of being informed that a change has occurred in the data provided during customer due diligence or one which affects the identity of the owner.</p>	<p>termination of the commercial relationship or from the date of execution of the commercial mandate. Persons with data access within Cordia FM: The Cordia FM manager, its employees and authorized agents. Data transmission: pursuant to Pmt. 25. §, Cordia FM is required to immediately transmit recorded and preserved data, in accordance with Pmt. 9. § and with respect to all legal entities or organizations without legal entity status as well as the actual owner of the trustee fiduciary, to the central registry created for the purpose of storing data, provided that the data do not appear in this central registry. Further, Cordia FM may transmit the data to the lawyer involved in the relevant transaction for the purpose of performing the legal duties related to the transaction.</p>
<p>Issue of tokens for entry into the individual apartment blocks and entry into areas within the building, as well as handling of movement data in the necessary areas for security reasons.</p>	<p>GDPR Article 6, (1) f) – data handling is necessary for the protection of the legitimate interests of Cordia FM, the apartment owners and the apartment block. Legitimate interest is the protection of objects of value in the apartment block, as well as in the communal areas and</p>	<p>The name of the effected token user, the number of the apartment associated with the token, the movement data connected to the token (which serial numbered token was used at what time to enter which door, and by whom), as well as the confirmation of receipt and signature of the person authorized to use the token, and the serial number of the token. The issue of the token is recorded on the basis</p>	<p>In the event that the movement data is not used (e.g. for submitting a report following a break-in or making a claim under civil law), we will delete the data within 30 days of termination of use of the token. This is the period of data retention during which Cordia FM is able to assess any legal breaches associated with use of the token. We will delete the other data 5 years after authorization to use the token</p>

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	<p>in separate apartment buildings (protection of property). The data subject is not obliged to provide the data, but lacking data, Cordia FM is unable use the tokens to facilitate protection of the apartment house and the objects of property in the communal areas and the individual apartments.</p>	<p>of the serial number of the token in the handover log, which contains the number of the apartment associated with the token, the name of the owner, the name and telephone number of the person receiving the token, the date of issue of the token, the signature of the recipient and the name of the person issuing the token, as well as the basis for the issue of the token (e.g. transfer of ownership register or equivalent statement from the owner). The relevant person may demonstrate their right to receipt of the token primarily by presenting the registry of transfer of ownership or equivalent statement from the owner, or, in the absence of such, the purchase contract, rental contract or other agreement associated with the use of the apartment, a legally binding court order or official resolution. The movement data associated with the token is stored by Cordia FM on a separate server for the individual apartment block.</p>	<p>is revoked in accordance with Ptk. § 6:22. (Any claims associated with use of the token expire after 5 years.) Persons with data access within Cordia FM: The Cordia FM manager, as well as house representatives providing management services on behalf of the apartment owners. For new apartments or the sale of existing properties, the token is handed over by the seller at transfer of ownership. Later, e.g. for replacement of a lost token or when a new token is required, the house representative will issue a token, or, if the time is outside the house representative's hours or subject to extraordinary circumstances, it may be provided by the security service in accordance with the following. Remote access to the data is also granted to Cordia FM's data processing partner, Belváros Security Kft., in its security center located on the ground floor of the Tömő utca 1 building in District VIII. The responsibilities of Belváros Security Kft. include uploading of the authorization data to finished tokens, granting the necessary authorization for use, issuing tokens outside of the house representative's hours or in extraordinary circumstances (e.g. requests for new tokens in the event of loss when the house representative cannot be reached), review</p>

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			<p>of data in the event of security events (e.g. unauthorized use of tokens, break-ins, burglaries), as well as storage of the associated data. Belváros Security Kft. takes possession of those unauthorized tokens that have not been issued from the house representative, deleting the data or authorizations stored on them if necessary, providing these to the effected persons or returning them to the house representative at his or her request.</p>
<p>Issue of garage access cards used for entry into the garage areas of the individual Cordia apartment buildings, as well as handling of movement data in the necessary areas for security reasons.</p>	<p>GDPR Article 6, (1) f) – data handling is necessary for the protection of the legitimate interests of Cordia FM and the apartment block, as well as those authorized to use the car park and other users. Legitimate interest is the protection of objects of value in the apartment building, as well as in the parking areas (protection of property). The data subject is not obliged to provide the data, but lacking data, Cordia FM is unable use garage access cards to facilitate protection of the apartment house and the objects of property in the car parks.</p>	<p>The name, parking space number and apartment number of the effected garage access card user. For outside persons – those not living in the given apartment house or not owners of an apartment in the building – their address, their movement information associated with the garage access card (the serial number of the garage card, the time, and which door they entered or exited), as well as the signed statement of receipt of the garage access card, and the serial number of the garage access card. The relevant person may demonstrate their right to receipt of the garage access card primarily by presenting the registry of transfer of ownership or equivalent statement from the owner, or, in the absence of such, an agreement associated with the use of the</p>	<p>In the event that the movement data is not used (e.g. for submitting a report in the event of burglary or making a claim under the law), we will delete the data within 15 days of termination of use of the garage access card. This is the period of data retention during which Cordia FM is able to assess any legal breaches associated with the use of the garage access card. We will delete the other data 5 years after authorization to use the garage access card is revoked in accordance with Ptk. § 6:22. (Any claims associated with use of the garage access card expire after 5 years.) Persons with data access within Cordia FM: The Cordia FM manager, as well as house representatives providing management services on behalf of the apartment owners. The garage access card is handed over by the seller or other</p>

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		<p>parking space, a legally binding court order or official resolution.</p>	<p>authorized person when the parking space is assigned. Later, e.g. for replacement of a lost garage access card or when a new garage access card is required, the house representative will issue a token, or, if the time is outside the house representative's hours or subject to extraordinary circumstances, it may be provided by the security service in accordance with the following. Remote access to the data is also granted to Cordia FM's data processing partner, Belváros Security Kft., in its security center located on the ground floor of the Tömő utca 1 building in District VIII. The responsibilities of Belváros Security Kft. include uploading of the authorization data to finished garage access cards, granting the necessary authorization for use, issuing tokens outside of the house representative's hours or in extraordinary circumstances (e.g. requests for new tokens in the event of loss when the house representative cannot be reached), review of data in the event of security events (e.g. in the event of garage access keys, break-ins, burglaries), as well as storage of the associated data. Belváros Security Kft. takes possession of those unauthorized garage access cards that have not been issued from the house representative, deleting the data or authorizations stored</p>

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			on them if necessary, providing these to the effected persons or returning them to the house representative at his or her request.
<p>Handling of water and utility meter readings in the individual apartment blocks, remote reading of utility meters for separately owned properties, recording of the data and payment of the associated bills.</p>	<p>GDPR Article 6, (1) b) data handling is necessary for the protection of the legitimate interests of Cordia FM, the owners of apartments in the apartment block and other users. Legitimate interest is the provision of information to the owners of apartments in the apartment block and other users with information on consumption of water and other utilities in order to facilitate effective monitoring of the associated costs.</p>	<p>The building and apartment number associated with the water meter and utility consumption, as well as the consumption data (meter reading). This data can, if necessary (particularly for the provision of information to the effected party) be linked to the given person. Data from the central meter in the apartment blocks and the meters located in the apartments (places of consumption) are combined in the electronic system owned by the given apartment building. The data are stored on the server of the apartment house, and access is also granted to Cordia FM's data processing partners.</p>	<p>We will delete the associated data 5 years after use of the apartment has ceased in accordance with Ptk. § 6:22. Persons with data access within Cordia FM: The Cordia FM manager, as well as house representatives providing management services on behalf of the apartment owners. Remote access to the data is also granted to Cordia FM's data processing partner, Belváros Security Kft., in its security center located on the ground floor of the Tömör utca 1 building in District VIII. If necessary, or as required by regular monitoring of utility costs (e.g. in the event of excess consumption, burst pipes, or changes in ownership), the data in question is saved by an employee or subcontractor of the data handler and provided on a data storage device to the house representative, or the effected persons.</p>
<p>To provide the necessary data in the necessary areas for safe handling of motion data for the GSM-based access control system used to enter the</p>	<p>GDPR Article 6 (1) (f) – data handling is necessary for the enforcement of the legitimate interests of the people who have access to the parking spaces, as well as those of Cordia FM and</p>	<p>The name of the user of the garage keycard, the number of parking spaces, the number of apartments, the address of the apartment building – not the individual apartments – motion data related to the garage keycard (which</p>	<p>In the absence of the use of motion data (e.g. in the case of a report in the event of a break-in, validation of civil law), the cancellation of the garage access will be carried out within 15 days of the termination of use. This is the retention</p>

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<p>garages of the properties of Phase 2 of Cordia Thermal.</p>	<p>the apartment house. The legitimate interest is the apartment house and the protection of property in the garages (property protection).</p>	<p>garage keycards have been registered, entered or deleted in the GSM system), as well as the receipt and signature of the garage keycard with a valid telephone number.</p> <p>The right to ownership of a garage keycard is demonstrated by a landing record or declaration of ownership declaration, and in the absence of any other agreement on the use of the parking space, by a final court order or official decision.</p> <p>Motion data related to the garage keycards for each apartment house is stored by Cordia FM on a separate server.</p>	<p>period during which the Company can assess any breaches related to the use of the garage keycard.</p> <p>Other data can be found after the termination of the use of the garages in the Civil Code. 6:22. Section 5 is deleted in 5 years' time. (Any claims related to the use of the garage will expire in 5 years.)</p> <p>Access for Cordia FM: The Managing Director of Cordia FM as well as persons performing building manager activities.</p> <p>The right to the parking space can, when it is assigned, be assigned to someone other than the owner via the GSM system by the owner or other authorized person, and later, if for example the keycard is lost or if there is a need for a new keycard, by the building manager, in their own time and, and in the following exceptional circumstances by the security service.</p> <p>The data is also accessed by the Cordia FM data processor partner, Belváros Security Kft. The tasks of Belváros Security Ltd. include the fulfilment of the completed garage keycard entitlements, the granting of the permissions to be used, when the housing manager is available and, in exceptional cases (e.g. the keycard is lost or if there is a need for a new keycard, or if the Building Manager is</p>

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			<p>unavailable) to garage keycards for certain parking spaces, security incidents (e.g. unauthorised use, burglary, theft) to view the data and store related data. Belváros Security Ltd. will take over unpublished, unauthorised garage keycards from the Housing Manager and, if necessary, delete the data or privileges, and issue it to the party concerned or to the Housing Manager upon request.</p>
<p>Handling the data of contact persons of other contracted partners acting in connection with contracts not identified in this Policy (in particular, agency contracts for furnishing, apartment house management contracts, agency contracts), and of persons who are involved in the performance of these contracts and in monitoring performance (on a daily basis). This includes, for example, handling the postal address of contact persons, the instructions of contact persons for making payments, or sending official notices by using the contact details and information on the contractual obligations to be fulfilled.</p>	<p>Depending on whether the contract is made with the data subject (e.g. individual entrepreneur) or another enterprise: Section 6(1) (b) of the GDPR – performance of the contract made directly with the data subject / Section 6 (f) of the GDPR – the legitimate interest of Cordia and the enterprise making a contract with it: fulfilling contractual obligations, exercising rights and coordinating economic cooperation between the parties.</p> <p>Transfer of personal data is a contractual requirement: without personal data, Cordia is unable to execute and perform the contract.</p>	<p>Name and contact details (email address, phone number, mobile phone number, fax number) of contracted partners (including their contact persons, as well as of persons involved in the performance of these contracts and in monitoring performance), and any activity and communication including personal data (e.g. from the contact person or from any other natural person acting on behalf of the partner).</p> <p>The personal data will be made available to Cordia by either the contractual partner or the data subjects themselves.</p>	<p>5 years from the termination of the legal relationship (Ptk. 6:22 § (1) – unless otherwise provided by the Ptk. the claims will lapse after 5 years.)</p> <p>For meeting tax obligations: the data retention period is 5 years from the last day of the calendar year in which the tax should have been declared or included in the tax return and should have been paid if the tax return was missing (Art. 78. § (3), 202. § (1)).</p> <p>For accounting statements: the data retention period is 8 years (Accounting Act, 168-169. §).</p> <p>Cordia’s employees acting during the execution and performance of the given contract</p>

<p>Handling the data of contracted partners, contact persons as well as persons involved in the performance of these contracts and in monitoring performance for compliance issues regarding the contracts or performing any other activity for ensuring performance of the contract, including seeking legal redress opportunities for ensuring contractual rights.</p>	<p>Cordia's legitimate interest (Section 6(1) (f) of the GDPR).</p> <p>Legitimate interest: handling compliance issues regarding the contracts or performing any activities for ensuring performance of the contract, including seeking legal redress opportunities for ensuring contractual rights.</p>	<p>Name and contact details (email address, phone number, mobile phone number, fax number) of contracted partners (including their contact persons, as well as of persons involved in the performance of these contracts and in monitoring performance), and any activity and communication including personal data (e.g. from the contact person or from any other natural person acting on behalf of the partner).</p> <p>The personal data will be made available to Cordia by either the contractual partner or the data subjects themselves.</p>	<p>5 years from the termination of the legal relationship (Ptk. 6:22 § (1) – unless otherwise provided by the Ptk. the claims will lapse after 5 years.)</p> <p>For meeting tax obligations: the data retention period is 5 years from the last day of the calendar year in which the tax should have been declared or included in the tax return and should have been paid if the tax return was missing (Art. 78. § (3), 202. § (1)).</p> <p>For accounting statements: 8 years (Accounting Act, 168-169. §). In practice, this is a case when the data constitute part of the documents supporting bookkeeping, for example, the data are shown in documents related to contracts between the Company and its partner (e.g. in orders) or on invoices issued.</p> <p>Cordia's employees acting during the execution and performance of the given contract.</p>
<p>Handling the data of contracted partners, contact persons as well as persons involved in the performance of these contracts and in monitoring performance for compliance issues regarding the contracts or performing</p>	<p>Cordia's legitimate interest (Section 6(1) (f) of the GDPR).</p> <p>Legitimate interest: handling compliance issues regarding the contracts or performing any activities for ensuring performance of the contract,</p>	<p>Name and contact details (email address, phone number, mobile phone number, fax number) of contracted partners (including their contact persons, as well as of persons involved in the performance of these contracts and in monitoring performance), and any activity and communication including</p>	<p>5 years from the termination of the legal relationship (Ptk. 6:22 § (1) – unless otherwise provided by the Ptk. the claims will lapse after 5 years.)</p> <p>For meeting tax obligations: the data retention period is 5 years from the last day of the calendar year in which the tax</p>

<p>any other activity for ensuring performance of the contract, including seeking legal redress opportunities for ensuring contractual rights.</p>	<p>including seeking legal redress opportunities for ensuring contractual rights.</p>	<p>personal data (e.g. from the contact person or from any other natural person acting on behalf of the partner).</p> <p>The personal data will be made available to Cordia by either the contractual partner or the data subjects themselves.</p>	<p>should have been declared or included in the tax return and should have been paid if the tax return was missing (Art. 78. § (3), 202. § (1)).</p> <p>For accounting statements: 8 years (Accounting Act, 168-169. §). In practice, this is a case when the data constitute part of the documents supporting bookkeeping, for example, the data are shown in documents related to contracts between the Company and its partner (e.g. in orders) or on invoices issued.</p> <p>Cordia’s employees acting during the execution and performance of the given contract.</p>
<p>Documenting the consents of the data subjects to data handling and the withdrawal of their consent, if any</p>	<p>Article 6(1 (c) of the GDPR (processing is necessary for compliance with a legal obligation to which Cordia as controller is subject).</p> <p>Legal obligation: pursuant to Article 7(1) of the GDPR, where processing is based on consent, the controller shall be able to demonstrate that the data subject has consented to processing of his or her personal data.</p>	<p>Where processing data by Cordia is based on consent of the data subject, Cordia will document the relevant consent. The goal of this is to be able to verify the lawfulness of the consent at any time. If the data subject withdraws his or her consent, Cordia will also retain this withdrawal (and any communication related to it). The goal of this is to ensure that Cordia will always know that a data subject has withdrawn his or her consent regarding a particular data processing action.</p>	<p>Data retention period: open-ended period, unless otherwise provided by the guidance of the data protection authority.</p> <p>The employees contributing to handling the consent and its withdrawal, as well as Cordia’s representative</p>

<p>Keeping records of privacy incidents (including the documentation of measures taken in order to manage such incidents).</p>	<p>Article 6(1 (c) of the GDPR (processing is necessary for compliance with a legal obligation to which Cordia as controller is subject).</p> <p>Legal obligation: pursuant to Article 33(5) of the GDPR, the controller shall document any personal data breaches, comprising the facts relating to the privacy incident involved, its effects and the remedial action taken. This documentation shall enable the supervisory authority to verify compliance with the requirements of the GDPR.</p>	<p>The personal data of the data subjects involved in the privacy incident.</p>	<p>Data retention period: open-ended period, unless otherwise provided by the guidance of the data protection authority.</p> <p>The employees contributing to handling the privacy incident, as well as Cordia's representative</p>
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