DATA HANDLING POLICY
Cordia FM Apartment House Management Limited Liability Company

Last modified: 31 July 2019

Contents

1. **General provisions and contact details**

This policy ("**Policy**") applies to the handling of any personal data concerning identified or identifiable natural persons (data subjects, according to the EU 2016/679 General Data Protection Regulation – "**GDPR**") by Cordia FM Társasházkezelő Korlátolt Felelősségű Társaság ("**Cordia FM**").

Cordia FM address: 1082 Budapest, Práter utca 29/a fszt. 21.
Cordia FM company registration number: Cg. 01-09-906033
Cordia FM webpage: https://cordia.hu/
Cordia FM phone number: 36 1 411 3000
Cordia FM e-mail address: cordia.fm@cordiahomes.com
Cordia FM representative and contact information: Földi Tibor, see contact information above
If you have any questions or remarks concerning this Policy, please contact Cordia at one of above contact details prior to using the website and prior to providing any information or data in accordance with this Policy.

2. **Updates and access to the Policy**

Cordia FM reserves the right to unilaterally modify the Policy, following any prior modifications, after which such modification shall come into effect, with attention to applicable legal restrictions and, if necessary, informing those concerned in due time prior to changes. The Policy is subject to change especially if it becomes necessary due to legislative changes, official data protection actions, business or employee requirements, new activities requiring handling of personal data, newly discovered security risks, or feedback from effected persons. Upon your request, Cordia FM will be happy to provide you with an up-to-date copy of the Policy.

3. Understanding and accepting the Policy

Specific data protection terms may apply during the course of using various other services or to specific data handling activities (such as operation of security cameras), about which you will be informed prior to using the given service or processing these specific activities.

The data subjects must make available to Cordia the relevant personal data pursuant to applicable regulations in every case. In particular, they must have appropriate and informed consent or other legal basis for transferring personal data (such as transferring the data of contact persons, relatives). Id Cordia learns that any of the data of a data subject has been transferred without their consent or without other legitimate legal basis, Cordia may immediately delete such data; in addition, the data subject will be entitled to exercise their rights and options for legal redress under this Policy. Cordia shall not be responsible for any damage, loss or injury arising from breach of the above obligations or statements by the data subject.

In the context of the data protection objectives established in this Policy, please always provide current personal information to us and to third parties. Regarding our property management service, for example, please provide your bank with your current address where the bank can send official notifications.

We also ask that in the context of the data protection objectives established in this Policy, please provide us only with the most necessary personal information. Regarding our property management service, for example, tenants often confirm rent payments by sending a particular part of their bank account – in cases like these, we ask that you obscure non-relevant data from your bank account.

If you provide us with access to your personal information through use of services from a third party service provider (like through the chat board of a social media platform), then the data handling may be subject to the data handling policy and other terms of use for the given service. Cordia FM bears no responsibility for this.

Cordia FM particularly calls the attention to all involved parties that those involved have the right to object, at any time and for reasons connected to their personal situation, to the legitimate interest-based handling of their personal data, including profiling based on the provisions mentioned. In this case, Cordia FM will cease handling personal data unless it proves that the data handling is justified by such compelling reasons which give it priority over the interests, rights and freedoms of the involved party, or which are connected to the submission, enforcement or protection of legal claims. If the handling of personal data occurs for direct business acquisition purposes, the involved party has a right to object at any time to the handling of their personal data for this purpose, including profiling, if it is connected to direct business acquisition.

The durations of the individual types of data handling were fundamentally determined on the basis of the following legal regulations:

– "**Art.**" – Act CL of 2017 on the rules of taxation. Cordia FM is obliged to keep the data supported by taxation certificates.

– "**Ptk.**" – Act V of 2013 on the Civil Code. If the duration of data handling is indicated as the expiry date of the obligation to provide information, the activity that interrupts the expiry extends the duration of data handling until the new date (Ptk. § 6:25 (2)). In the event that expiry is extended, the request can be presented within the one-year – or three-month if the period of expiry is shorter – deadline from the lifting of the restriction even if the period of expiry has already passed, or if less time remains than the above period. (Ptk. § 6:24 (2)).

– "**Accounting Act**" – Act C of 2000 on accounting. Cordia FM is required to hold certain data – such as those that are contained in the documents that support accounting, or that are included in the contract between Cordia FM and the client or on invoices issued – in accordance with the Accounting Act. The retention period of 8 years set forth in the Act from the date on which there was a piece of data in the given year that should be treated as an accounting item, or when the report/general ledger was based on the given data. In practice: if an item is included in a contract on the basis of which several different services are performed (e.g. several services are provided under the same contract), the 8-year period should be calculated separately for each service performed, because separate invoices are made out for each service, and the deals are recorded in the books accordingly. If the piece of data, for example, is included in a contract for the sale of something (the item has been delivered and the contract is terminated), the deal is entered into the books on the basis of the contract and the invoice, and the 8-year period mentioned above will commence from there.

4. **The scope of handled data and the purpose of data handling**

The scope of personal data processed by Cordia FM, the purposes of data handling, the duration of the data handling and those authorised to access the data are presented in the table below.
In accordance with Pmt. 12. §, the client is required during the entirety of the existence of a 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 person of the owner.

Purpose of data handling	Legal basis for data handling	Scope of data processed	Duration of data handling and rights of access
Provision of apartment house management activities by Cordia FM. 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.	Act CXXXIII. of 2003 on Apartment Houses, § 52. Law on the Civil Code, Act V. of 2013 ("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.	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.	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.

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.	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.	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 your 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 aprerequisite 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 propertyseeker and prospective tenant provided through the contact methods (telephone, e-mail,	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.

		inperson customer service) given in service advertisements (Facebook, Instagram, other social media platforms, real estate advertisement sites, print media) related to property management, as well as to provision of property management services, real estate rental, real estate brokerage and other services (furnishing, accountant mediation, etc.). For example, what kind of property is sought and in what location, price range, and the name, telephone number and e-mail address of the prospective tenant. If there is a suitable apartment available for rental, Cordia FM will contact the prospective tenant and personally show them the apartment. If the prospective tenant is interested in the apartment, Cordia FM will prepare the rental agreement between the prospective tenant and the landlord (Cordia FM's client). Cordia FM handles the personal information of the tenant that appears in the rental agreement (home address, tax number, mother's name, telephone number, bank account number), the name, address and telephone number of a third party to be notified in case of a problem (like a serious health issue), and in case of a student tenant, the name of the	

		educational facility along with a school attendance certificate. In the case of transferring services used by the tenant (internet, television, landline telephone) to the new address, the new address may be necessary to ensure the transfer of services in the minimum time necessary.	

Carrying out of residents association representative activities related to the handling of issues for the apartment houses' community of coowners by Cordia FM. 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.	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.	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).	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.

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 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. |

Carrying out customer due diligence measures in mediation of commercial real estate leasing rights.	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 adta, but lacking data, Cordia FM is unable	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	**Data**: Cordia FM, pursuant to Pmt. § 56, is authorized to handle personal information obtained while conducting required customer due diligence for 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

to meet its legal obligations and cannot contact the Client.

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 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

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 commercial relationship to inform Cordia FM within five working days of being informed that a change has occurred in the data provided

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.
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 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

	relationship, and is authorized to request information related to the origins of funds and supporting documentation.	during customer due diligence or one which affects the identity of the owner.	transmit the data to the lawyer involved in the relevant transaction for the purpose of performing the legal duties related to the transaction.
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.	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 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.	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 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	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 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

		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.	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 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.
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.	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.	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	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

		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 parking space, a legally binding court order or official resolution.	on behalf of the apartment owners. The garage access card is handed over by the seller or other 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 on them if necessary, providing these to the effected persons or returning them to the house representative at his or her request.

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.	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.	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.	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 Tömő 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.
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 garages of the properties of	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 the apartment house. The legitimate interest is the apartment house and the protection of property in	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 garage keycards have been registered, entered or deleted in the GSM	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 period during which the Company can assess any breaches related

Phase 2 of Cordia Thermal.	the garages (property protection).	system), as well as the receipt and signature of the garage keycard with a valid telephone number. The right to ownership of a garage keycard is demonstrated by a landing record or declaration of ownersip declaration, and in the absence of any other agreement on the use of the parking space, by a final court order or official decision. Motion data related to the garage keycards for each apartment house is stored by Cordia FM on a separate server.	to the use of the garge keycard. 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.) Access for Cordia FM: The Managing Director of Cordia FM as well as persons performing building manager activities. 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. 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 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.

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.	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. Transfer of personal data is a contractual requirement: without personal data, Cordia is unable to execute and perform the contract.	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). The personal data will be made available to Cordia by either the contractual partner or the data subjects themselves.	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.) 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)). For accounting statements: the data retention period is 8 years (Accounting Act, 168-169. §). Cordia's employees acting during the execution and performance of the given contract

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.	Cordia's legitimate interest (Section 6(1) (f) of the GDPR). 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.	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). The personal data will be made available to Cordia by either the contractual partner or the data subjects themselves.	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.) 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)). **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. Cordia's employees acting during the execution and performance of the given contract.
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,	Cordia's legitimate interest (Section 6(1) (f) of the GDPR). Legitimate interest: handling compliance issues regarding the contracts or performing any activities for ensuring performance of the contract, including seeking legal redress opportunities for	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	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.) 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

including seeking legal redress opportunities for ensuring contractual rights.	ensuring contractual rights.	data (e.g. from the contact person or from any other natural person acting on behalf of the partner). The personal data will be made available to Cordia by either the contractual partner or the data subjects themselves.	the tax return and should have been paid if the tax return was missing (Art. 78. § (3), 202. § (1)). **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. Cordia's employees acting during the execution and performance of the given contract.
Documenting the consents of the data subjects to data handling and the withdrawal of their consent, if any	Article 6(1 (c) of the GDPR (processing is necessary for compliance with a legal obligation to which Cordia as controller is subject). **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.	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.	**Data retention period:** open-ended period, unless otherwise provided by the guidance of the data protection authority. The employees contributing to handling the consent and its withdrawal, as well as Cordia's representative

| Keeping records of privacy incidents (including the documentation of measures taken in order to manage such incidents). | Article 6(1 (c) of the GDPR (processing is necessary for compliance with a legal obligation to which Cordia as controller is subject).

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. | The personal data of the data subjects involved in the privacy incident. | **Data retention period:** open-ended period, unless otherwise provided by the guidance of the data protection authority.

The employeees contributing to handling the privacy incident, as well as Cordia's representative |

5. **Transfer of personal data to our contracted partners**

Cordia FM uses the below contracted partners for the completion of tasks related to data handling activities. The contracted partner acts as a so-called 'data processor': it handles the personal data outlined in this policy on behalf of Cordia FM.
Cordia FM may only use such data processors which provide adequate guarantees, in particular concerning expertise, reliability and resources, regarding the implementation of technical and organisational measures to ensure compliance with GDPR requirements, including data handling security. The specific tasks and responsibilities of the data processor are specified by the contract between the data processor and Cordia. Following the handling of data on behalf of Cordia, the data processor will return or delete the personal data at Cordia's decision, unless EU law or that of a member state applicable to the data processor prescribes its storage.

Contracting partner	What data does the company have access to? What does the company do?	How long does the company store the data for?
Ágnes Damján private entrepreneur E-mail: damjan.agnes@cordia.hu	Has access to data intended for data handling purposes for provision of property rental, real estate brokerage and	Service contract of undefined duration – until termination of the contract.

	other services (furnishing, accountant mediation, etc.) related to the property management service conducted by Cordia FM.	
HC- System Kft. Headquarters: 1108 Budapest Agyagfejtő u. 12. 3/14., Telephone: +3630 916 1620	In order to carry out minor construction and demolition on the residential property, it may be necessary to access a minimal quantity of data, for example, the data required for accessing the property (address, tenant's contact details, information related to the type of work).	Service contract of undefined duration – until termination of the contract.
Belváros Security Kft. Headquarters: 1082 Budapest Futó utca 34-36, Staircase 6, Floor 4 Email:belvarossecurity@gmail.com	24-hour provision of remote monitoring, dispatch and security guard services for the Cordia apartment blocks (Corvin sétány), including loading of data onto the tokens used to enter the Cordia apartment blocks, as well as entry to areas on the interior of the building, further the loading of data onto the garage access cards used to enter the parking areas, granting of the necessary rights for use, issuing of authorization to tokens/garage access keys outside of the house representative's hours, as well as issue of tokens/garage access keys in extraordinary circumstances, further the review of data in the event of a security event, as well as storage of the associated data, as well as taking possession of tokens/garage access keys that have not been issued or are unauthorized, deleting the data or authorization stored on them if necessary, and providing them to the effected persons or returning at the request of the house representative. As required, the data	Service contract of undefined duration – until termination of the contract.

	handler also manages the movement data associated with the effected token/garage access key for security reasons in accordance with the above. In addition, electronic remote reading of utility meters: The water meter and other utility meter readings for the individual apartments are also available at the security center on the ground floor Tömő utca 1 in District VIII of Budapest, and can be accessed if required by employees and subcontractors providing the security service for the data handler.	
SBE Kft. Registered office: 7625 Pécs, Böck János u .11 Tax number: 23790221-2-02 Company registration number: 02-09- 078485	A subcontractor involved in furnishing apartments. The company directly contacts the owner of the residential property regarding the provision of furniture and carpentry work. This company has access to the minimum data required for this purpose (address, owner's contact details and information on the nature of the work to be carried out).	Indefinite business contract – until termination of the contract.

6. **Cookies used on the website**

Cookies are used in certain areas of the website. The cookies are files that store information on your hard disk or web browser.
Cookies, for example, make it possible for the website to recognise if you have visited previously, or, by allowing us to see which sites you visit and how much time you spend there, help us understand what part of the website is most popular. By studying this, we can better adjust the site to your needs and offer a more varied user experience. With the help of cookies, we can assure that the information displayed on your next visit to the site will meet your expectations. When you visit one of our websites, technical information may be gathered that does not allow you to be personally identified. For example, the name of another website that directed you here, the location from where you accessed the website, and search queries completed on the website. Collecting this information helps us identify the preferred search habits of our website users without using their personal data. Such information is used strictly for internal

purposes. Anonymous or general data from which your person cannot be identified does not qualify as personal data and thus does not fall within the scope of this Policy.

You can change the web configuration to either accept cookies, delete all cookies, or receive notification when cookies appear on your machine. Since all web applications are different, we ask that you use the 'Help' menu on your browser to adjust your cookie settings. You can find further information on cookies and disabling them at http://www.youronlinechoices.com/hu/. The https://cordia.hu website was intended to operate with the use of cookies, so disabling them may affect on the functionality of the website, or prevent you from taking advantage of all its benefits.

Links for the handling of cookies in the case of most frequently used browsers:

Mozilla Firefox
Google Chrome
Internet Explorer

Google Analytics provides a further option of unsubscribing from the Google Analytics service: http://tools.google.com/dlpage/gaoptout?hl=en-GB.

Cookies used on the website – cookies table.

Cookie name	Cookie type	Why is it necessary for the webpage and what is its function with respect to the user? What data does it have access to?	Lifetime
sess	Cookie used by Cordia's service providers (third-party cookie) Domain: .adnxs.com (AppNexus)	The purpose of the cookie is to test if the browser accepts cookies.	For the duration of the user's visit to the website (session). Cookies set up for this purpose are automaticall y deleted upon closing the website.
anj	Cookie used by Cordia's service providers (third-party cookie) Domain: .adnxs.com (AppNexus)	The cookie identifies the device of the returning user. We use it to display identified targeted advertising.	3 months
uuid2	Cookie used by Cordia's service providers (third-party cookie) Domain: .adnxs.com (AppNexus)	The cookie can recognise browser and device type, users' interests and the history of advertisements displayed on the device or browser. This information is used for the selection and delivery of advertisements, as well for measuring the performance of the advertisements. Further information:	3 months

		https://www.appnexus.com/en/company/platfor m-privacy-policy	
icu	Cookie used by Cordia's service providers (third-party cookie) Domain: .adnxs.com (AppNexus)	This cookie manages the number of times a user sees a given advertisement. The cookie contains such information as, for example, how many times advertisements were displayed, how the advertisement was displayed in the recent past, and how many times all advertisements have been displayed. Pixel tracker – also known as clear GIF or web beacon, is an unseen mark on a website (but not on the device). If a user visits the webpage, the pixel sends a broad general notification of the visit. These usually work together with cookies – recording whether a webpage was visited through a particular device.	No longer than 90 days

_ga	Cookie used by Cordia (own cookie) Domain: .cordia.hu	The cookie relates to Google Universal Analytics. It distinguishing between individual users and generates statistical data on how the user accesses the website.	2 years
_gat_UA-#	Cookie used by Cordia (own cookie) Domain: .cordia.hu	In order to allow the measurement and optimisation of the performance of the website with the help of Google Analytics, this cookie makes it possible to count the number of visitors to the website and traffic sources.	1 minute
__gfp_64b	Cookie used by Cordia (own cookie) Domains: .cordia.hu / .gemius.pl	This cookie handles other cookies accepted by the user. The purpose of this is to track user activity across multiple websites. In practice this is done by storing the user's search history to increase the effectiveness of marketing tools and, maintaining anonymity, prepare reports on this in comparison with the Webpage Database. For example, Cordia can access which website a user left before accessing https://cordia.hu/	3 years

		and began or finished requesting an offer. Cordia can thus conclude the effectiveness of their marketing tools (for example, an advertisement that can be clicked to bring a user onto the Cordia website) by determining, for example, how many times an advertisement must appear on the original website to make the user more likely to ask for an actual offer from Cordia.	
_gid	Cookie used by Cordia (own cookie) Domain: .cordia.hu	This cookie distinguishes/recognises users and generates statistical data on how users access the website.	24 hours
_dc_gtm_UA-#	Cookie used by Cordia (own cookie) Domain: .cordia.hu	This cookie makes it possible to track website activity and analysis. It helps in identifying the age, gender and interests of users.	For the duration of the user's visit to the website (session). Cookies set up for this purpose are automaticall y deleted upon closing the website.
IDE	Cookie used by Cordia's service providers (third-party cookie) Domain: .doubleclick.net	The purpose of this cookie is to measure the effectiveness of advertisements and to generate targeted advertisements for users. Through the use of Google DoubleClick, it records the user's activity on the website after the user has viewed an advertisement.	2 years
DSID	Cookie used by Cordia's service providers (third-party cookie) Domain: .doubleclick.ne t	This cookie is set up when the user blocks participation in the GemiusAudience survey. (via various research surveys and advertising networks).	4 years
id	Cookie used by Cordia's service providers (third-party cookie) Domain: .mookie1.com	This cookie registers a unique identifier that identifies the returning user's device. The identifier is used for the display of targeted advertisements.	1 year

mdata	Cookie used by Cordia's service providers (third-party cookie) Domain: .mookie1.com	This cookie registers a unique identifier that identifies the returning user's device. The identifier is used to display targeted advertisements.	1 year
OAX	Cookie used by Cordia's service providers (third-party cookie) Domain: .mookie1.com	This cookie regulates the frequency of targeted advertisements and helps display relevant advertisements.	1 year
_hjIncludedInSampe	e Cookie used by Cordia (own cookie) Domain: .cordia.hu	The purpose of this cookie is analysis: it individually identifies the user, and indicates what audience set they belong to.	For the duration of the user's visit to the website (session). Cookies set up for this purpose are automaticall y deleted upon closing the website.
_icl_current_language	Cookie used by Cordia (own cookie) Domain: .cordia.hu	This cookie stores the user's language preferences.	24 hours
.cookie_law	Cookie used by Cordia (own cookie) Domain: .cordia.hu	This cookie records the user's cookie settings.	60 years
wp-settings-	Cookie used by Cordia (own cookie) Domain: .cordia.hu	This cookie serves to personalise the appearance of the administration interface. (Only for administrators.) The admin interface is a separate area within the website, where the building, configuration, editing, display and other typical configuration, processing and publication of the final contents of the website takes place. Only users with th relevent authorisation have access to the admin interface. So-called 'secure cookie'	1 year
wp-settings-time-	Cookie used by Cordia (own cookie) Domain: .cordia.hu	This cookie serves to personalise the appearance of the administration interface. (Only for administrators.) The admin interface is a separate area within the website, where the building, configuration, editing, display and other typical	1 year

		configuration, processing and publication of the final contents of the website takes place. Only users with th relevent authorisation have access to the admin interface. So-called 'secure cookie'	
PHPSESSID	Cookie used by Cordia (own cookie) Domain: .cordia.hu	The purpose of this cookie is to track the user's activities on the website.	For the duration of the user's visit to the website (session). Cookies set up for this purpose are automaticall y deleted upon closing the website.
SESS	Cookie used by Cordia (own cookie) Domain: .cordia.hu	The purpose of this cookie is to record users browsing behaviour on various websites, and log the information they provided	For the duration of the user's visit to the website (session). Cookies set up for this purpose are automaticall y deleted upon closing the website.
__utma	Cookie used by Cordia's service providers (third-party cookie) Domain: .cordia.hu	This cookie keeps track of when the user visited the website – when they visited first and whenthey visited last.	
__utmb	Cookie used by Cordia's service providers (third-party cookie) Domain: .cordia.hu	This cookie records the time when the user visited a website.	For the duration of the user's visit to the website (session). Cookies set up for this purpose are automaticall y deleted upon closing the website

__utmc	Cookie used by Cordia's service providers (third-party cookie) Domain: .cordia.hu	The cookie records the time when the user left the website.	30 minutes
__utmz	Cookie used by Cordia's service providers (third-party cookie) Domain: .cordia.hu	The cookie records where the user arrived at the website from, what search engine they used, what link they clicked on, what keywords they used and where they were located at the time they accessed the website.	6 months

7. Personal data relating to children and third parties

With the exception of when parental consent is provided, persons under 16 years of age are not permitted to provide any personal data.

By providing personal data, you declare and affirm that you have considered the above and that your legal capacity related to providing personal data is not limited.

If you do not have the right to independently provide personal data, you must acquire the permission of the appropriate third party (i.e. legal representative, guardian, other persons you are representing), or provide another form of a legal basis to do so. In relation to this, you must be able to consider whether the personal data to be provided requires the consent of a third party. To this point, you are responsible for meeting all the necessary requirements, as Cordia FM may not otherwise come into contact with the data subject and Cordia FM shall not be liable or bear any responsibility in this regard. Nevertheless, Cordia FM has the right to check and verify whether the proper legal basis has been provided with relation to the handling of data at all times. For example, if you are representing a third party, we reserve the right to request the proper authorisation and/or consent of the party being represented with relation to the matter at hand.

We will do everything in our power to remove all unauthorised information provided and ensure that such information is not forwarded to any third party, or used for our own purposes (advertising or any other activity). We request that you inform us immediately should you become aware that a child or any other third party has provided any personal data of yours that you have not properly authorised them to do so.

8. Data security

Data processed by Cordia FM is protected by the restrictions applied to the access of information. For example, only those who require it, in the interests of and for the purposes listed previously, have access to the data.

9. Your data protection rights and legal options for remediation

Your data protection rights and legal options for remediation are detailed in the relevant provisions of the GDPR (particularly in GDPR articles 15, 16, 17, 18, 19, 20, 21, 22, 77, 78, 79, 80 and 82). The following summary contains the most important provisions, as well as information provided accordingly by Cordia FM, on your rights and legal options for remediation regarding data handling. The information must be provided in writing or in other forms – including electronically in some cases. Verbal information may also be provided upon request, provided that you have otherwise confirmed your identity.

Cordia FM will inform you of any measures taken in response to your request without undue delay, but in any case within one month of the arrival of your application for legal remediation (see GDPR articles 15-22). If necessary, taking into account the complexity and number of applications, this deadline can be extended by two additional months. Cordia FM will inform you within one month of receiving the request of the extension of this deadline by indicating the reasons for the delay. If you submitted your request electronically, you must be informed electronically whenever possible unless otherwise requested.

If Cordia FM takes no action following your request, you will be informed of the reasons for the failure to act without delay and at most within one month of receipt of your request. You will also be informed that you may submit a complaint with a supervisory authority and exercise your right to judicial redress.

9.1 Access rights

(1) You are entitled to receive a notification from us to indicate that the handling of your personal data is in progress. If data processing is in progress, you are entitled to be provided with access to your personal data and the following information:
a) purpose of the data handling;
b) categories of the data subject's personal data;
c) recipients or categories of recipients, who have been or will be informed of personal data, particularly third party national recipients and international organisations;
d) where appropriate, the planned period of personal data storage, or it is not possible to provide this, the criteria for determining such a timeframe;
e) it is your right to request an update, deletion or processing restriction of personal data related to you, as well as to object to such personal data handling;
f) the right to lodge a complaint to the supervisory authority; and
g) if the data was not provided by you, all available information as to the source of such data;
h) automated decisions, including profiling, and at least in these cases, the applied logic and related information, the degree of relevance and expected consequences that these types of data handlings have for you.
(2) If personal data is transferred to a third country, you are entitled to receive notification of such associated applicable guarantees.
(3) A copy of the personal data subject to the data handling shall be made available to you. If your request was made electronically, the information shall be made available in the most commonly used electronic format, unless requested otherwise.

9.2 Right to update

You are entitled to have your information updated without delay or reason at your request. You are entitled to request that any missing or incomplete personal data is updated by making, *inter alia*, a supplementary declaration.

9.3 Right to deletion ('right to be forgotten')

(1) You are entitled to have your information deleted without delay or reason, at your request, if any of the following conditions are met:
a) there is no longer a need for the personal data for the purposes it was gathered for or handled otherwise;
b) you revoke your consent on which the handling is based and there is no other legal basis for the data handling;
c) you object to the data handling, and in the given case there is no overriding legitimate reason for the data handling;
d) the personal data was processed unlawfully;
e) the personal data must be deleted in order to fulfil our obligations under European Union or Member State law; or
f) the collection of personal data was associated with the offering of information society services.
(2) If Cordia FM disclosed any personal data and is obligated to delete such data based on paragraph (1), Cordia FM shall, with consideration to available technology and costs associated with carrying them out, take the necessary and expected steps – including technical measures – in the interest of informing those handling the data that the data subject has requested the deletion of links to the personal data in question or copies thereof, as well as further duplication of such personal data.
(3) Paragraphs (1) and (2) are not applicable in so much as the data handling is necessary, among others:
a) for the purposes of exercising the right to freedom of expression and information;
b) for the purposes of fulfilling our obligations relating to personal data handling under European Union or Member State law, as defined therein;
c) for the purposes of archiving in the public interest, scientific and historical research or statistical purposes, in so much as the rights contained in paragraph (1) would seriously threaten such data

handling or most likely make it impossible; or
d) for the submission, validation and protection of legal proceedings.

9.4 Right to restrict data handling

(1) You are entitled to request that we restrict data handling if any of the following conditions are met:
a) you argue the accuracy of the personal data, in which case the restriction is applied for the timeframe that allows for the inspection of the personal data's accuracy;
b) the data handling is unlawful and you object to the deletion of the data, and instead request its restricted use;
c) we have no further use for the data for the purposes of data handling, but you request them for the submission, validation and defence of your legal claims; or
d) You objected to the data handling; in which case, the restriction applies to the time period required to determine whether Cordia FM's legitimate reasons take precedence over those of the data subject.
(2) If data handling is subject to a restriction based on paragraph (1), such personal data, with the exception of storage, can only be processed with your consent, or for the submission, validation and defence of your legal claims, or in the interests of protecting the rights of other natural or legal persons, or in the important public interest of the European Union or a Member State.
(3) We shall inform you prior to the lifting of the data handling restriction.

9.5 Notification obligation related to the updating, deleting and data handling restriction of personal data

Cordia FM shall communicate any updates, deletion or data handling restriction to those recipients to whom the data have been disclosed, unless this proves to be impossible or requires excessive resources. We shall inform you of the recipients upon your request.

9.6 Right to data portability

(1) You are entitled to receive personal data applicable to you and made available to us, in an articulate, commonly used, machine-readable format, furthermore, you are entitled to forward these data to another data processor without obstruction from Cordia FM, if:
a) data handling is based on consent or a contractual agreement; and
b) data handling takes place through automated means.
(2) In exercising the right of data portability according to paragraph (1), you are entitled to – if technically possible – request the direct transmission of personal data between data controllers.

9.7 Right to object

(1) You have the right to object, on grounds relating to your own situation, to the handling of personal data based on a legitimate interest, including profiling. In such a case, we shall not further process your personal data, unless we demonstrate compelling legitimate grounds for handling that takes precedence over your interests, rights and freedoms or relates to the submission, validation and defence of legal claims.
(2) If the personal data is processed for the purposes of direct marketing, you have the right to object, at any time, to the handling of personal data relating to you in the interest of such, which also includes profiling in so much as it relates to direct marketing.
(3) If you object to the handling of personal data for the purposes of direct marketing, the personal data can no longer be processed for this purpose.
(4) You may also exercise your right to object through automated means, based on technical specifications, relating to the use of information society services and notwithstanding Directive 2002/58/EC of the European Parliament.
(5) If the handling of personal data is for the purpose of scientific or historical research or for statistical purposes, you have the right to object, on grounds relating to your own situation, to the

handling of personal data, unless the handling of data is necessary for the performance of tasks carried out in the public interest.

9.8 Right to lodge a complaint to the supervisory authority

You are entitled to lodge a complaint to a supervisory authority – particularly in your habitual residence, place of work or the Member State of the alleged infringement – if, according to your assessment, the handling of personal data related to you infringes your rights under the GDPR. The competent supervisory authority in Hungary is: National Authority on Data Protection and Freedom of Data (http://naih.hu/; 1530 Budapest, Pf.: 5.; Tel.: +36 1 391 1400; fax: +36 1 391 1410; e-mail: ugyfelszolgalat@naih.hu).

9.9 Right to an effective judicial remedy against a supervisory authority

(1) You are entitled to an effective judicial remedy against the supervisory authority's legally binding decision applicable to you.
(2) You are entitled to an effective judicial remedy if the competent supervisory authority does not respond to the complaint, or does not inform you within three months on the progress or outcome of the proceedings related to the lodged complaint.
(3) Proceedings against a supervisory authority shall be brought before the courts of the Member State where the supervisory authority is established.

9.10 Right to effective judicial remedy against the data controller or processor
(1) You are entitled to an effective judicial remedy if, according to your assessment, the handling of personal data was improperly processed as per the GDPR and, as a result, infringes your rights under the GDPR.
(2) The proceeding must be initiated against the data controller or the data processor before the courts of the Member State where the data controller or data processor has its principal place of business. Such proceedings may be initiated before the courts of the Member State of the data subject's usual place of residence. Such cases are heard in Hungary by the relevant local court of jurisdiction. The effected party is entitled to initiate a claim according to their place of residence or temporary accommodation – whichever he or she prefers. You can find out more about the jurisdiction and contact details of the court (local court of jurisdiction) at the following website: www.birosag.hu.