Data Protection Notice about the guest registration and entry process to the area 1103 Budapest, Gyomroi street 108-126

Controller

The Kőbányai Ingatlankezelő- és Hasznosító Kft. is the controller responsible for the processing of your data.

Our contact details are as follows: Kőbányai Ingatlankezelő- és Hasznosító Kft. 1103 Budapest, Gyömrői utca 108-126 e-mail: gyuru@horvathrt.hu tel: +36309506651

Processed categories of data

The following categories of data are processed:

- personal identification data (e.g. name, ID-card number)
- Communication data (e.g. telephone)
- if applicable, license number of the vehicle used by the visitor
- if a visitors card with picture is made, photo of the visitor
- movement data inside the area
- Result of the breath analyzer in case of alcohol test

Processing purposes and legal bases

We; as well as the service providers (data processors) commissioned by us; process your personal data for the following processing purposes:

- a) Registration and register of visitors entering the area (Legal basis: legitimate interest in protection of welfare and property).
- b) Taking pictures, registering internal movement, other controlls in order to safeguard the safety of the site and the protection of safety and welfare.

(Legal bases: legitimate interest in protection of welfare and property).

Data transfer to other controllers

Principally, your personal data is forwarded to other controllers (e.g. Authorities) only if required for the fulfillment of a contractual obligation, or if we ourselves, or a third party, have a legitimate interest in the data transfer, or if you have given your consent.

Additionally, data may be transferred to other controllers when we are obliged to do so due to statutory regulations or enforceable administrative or judicial orders.

Service providers

Our general data processor is Robert Bosch Kft. (1103 Budapest, Gyomrői ut 104.) Protection of the site is principally provided by P. Dussmann Kft. (1134 Budapest, Váci út. 35.)

Transfer to recipients outside the EEA

We might transfer personal data to recipients located outside the EEA into so-called third countries. In such cases, prior to the transfer we ensure that either the data recipient provides an appropriate level of data protection (e.g. due to a decision of adequacy by the European Commission for the respective country or due to the agreement based on so-called EU model clauses with the recipient) or that you have consented to the transfer.

You are entitled to receive an overview of third country recipients and a copy of the specifically agreed-to provisions securing an appropriate level of data protection. For this purpose, please use the statements made in the <u>Contact</u> section.

Duration of storage; retention periods

In all other cases we delete your personal data with the exception of data we are obliged to store for the fulfillment of legal obligations (e.g. due to retention periods under the tax and commercial codes we are obliged to have documents such as contracts and invoices available for a certain period of time).

We store the personal data provided by you until the following time:

- a) data in the declaration of secrecy: 6 months after signing the document
- b) movement data: 6 months for the date on which the data has been created, in case of an occasional entry, 24 hours after leaving the site
- c) visitors card with photo: until the termination of your access right.

The personal data, if unused, is abolished or deleted by the Security Service after the expiry of the period above. Use of the personal data shall mean particularly when it is submitted as evidence in a court proceeding or some other official proceedings.

User rights

To enforce your rights, please use the details provided in the <u>Contact</u> section. In doing so, please ensure that an unambiguous identification of your person is possible.

Complaints lodged against the actions of the security guards are examined every time by the management of the Security Service, the outcome of the examination is provided to the data subject in writing.

Right to information and access: You have the right to obtain confirmation from us about whether or not your personal data is being processed, and, if this is the case, access to your personal data.

Right to correction and deletion: You have the right to obtain the rectification of inaccurate personal data concerning yourself without undue delay from us. Taking into account the purposes of the processing, you have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

This does not apply to data which is necessary for billing or accounting purposes or which is subject to a statutory retention period. If access to such data is not required, however, its processing is restricted (see the following).

Restriction of processing: You have the right to demand for – as far as statutory requirements are fulfilled – restriction of the processing of your data.

Objection to data processing: You have the right to object to data processing by us at any time. We will no longer process the personal data unless we demonstrate compliance with legal requirements to provide provable reasons for the further processing which are beyond your interests, rights and freedoms or for the establishment, exercise or defense of legal claims.

Objection to data processing based on the legal basis of "justified interest": In addition, you have the right to object to the processing of your personal data at any time, insofar as this is based on a justified interest. We will then terminate the processing of your data, unless we demonstrate compelling legitimate grounds according to legal requirements which override your rights.

Right of complaint with supervisory authority: You have the right to lodge a complaint with a supervisory authority. You can appeal to the supervisory authority which is responsible for your place of residence or your state of residency or to the supervisory authority responsible for us. This is:

National Authority for Data Protection and Freedom of Information H-1125 Budapest Szilágyi Erzsébet fasor 22/C. Hungary

Telefon: + 36 1 391 1400, Telefax: + 36 1 391 1410, E-Mail: privacy@naih.hu, Homepage: <u>http://www.naih.hu</u>

Contact

If you wish to contact us, please find us at the address stated in the "Controller" section.

Effective date: 2020.07.01