

## PRIVACY POLICY

### Akácfa 60 residential project

#### I. Purpose and scope of the Privacy Policy

- 1.1 The purpose of this Privacy Policy is to ensure the information obligation of Pannónia Pension Fund (hereinafter: Pension Fund or Data Controller), as Data Controller, under the European Union Regulation No. 2016/679 (General Data Protection Regulation, hereinafter the “**GDPR**”), and under the applicable national legislation in force at all times, currently under Paragraph 16. § of Act CXII of 2011 on Information Self-Determination and Freedom of Information. (hereinafter: referred to as “**Info Act**”) in order to ensure that the persons interested in the real estate (apartment, storage, car parking space) of the 39 apartment building (hereinafter: **Project**) to be built by the Pension Fund as an investor under 1073 Budapest, Akácfa u. 60. via the [www.a60.hu](http://www.a60.hu) website (hereinafter: **Website**) or by other means, as well as other interested persons and persons purchasing the properties (hereinafter: **Data Subjects**) have sufficient information in relation to in which manner the Pension Fund manner process their personal data, including the information that the Pension Fund is obliged to inform the data subjects in accordance with the relevant personal data protection legislation.
- 1.2 The provisions of this Privacy Policy may be supplemented by other information that the Data Subject has received from the Data Controller, as well as other terms of use that are valid on the Website, as well as the general privacy policy available on the Data Controller's website (<https://www.pannonianyp.hu/adatkezelesi-tajekoztato/>) .
- 1.3 In the absence of information to the contrary, the scope of this Privacy Policy does not cover other data processes.
- 1.4 The Data Controller reserves the right to unilaterally change or modify this Privacy Policy at any time. The Data Controller informs the data subjects about changes and modifications to this Privacy Policy on the Website.
- 1.5 Information on the Data Controller: Pannónia Pension Fund (seat: 1068 Budapest, Benczúr utca 11. registration number: 01-04-0000052, postal address: 1441 Budapest Pf. 50, telephone: +36-1-478-4000, [www.pannonioanyp.hu](http://www.pannonioanyp.hu); contact details of data protection officer: +36 1 799-7701, [adatvedelem@pannonianyp.hu](mailto:adatvedelem@pannonianyp.hu) ).

#### II. Purpose of the data process, the scope of personal data processed, the legal basis for data process and the duration of data process

The purposes of Data process, the scope of personal data processed, the legal basis for data process and the duration of data process are contained in the table below:

	<b>Purpose of data process</b>	<b>Scope of personal data processed</b>	<b>Legal basis for data process</b>	<b>Duration of data processd</b>
2.1	<p>The Data Controller wishes to create an opportunity for persons interested in the apartments of the Project to subscribe to the list kept by the Data Controller's project manager, GPM Kft., based on their own initiative, on the Website or by other means, on the basis of which the Data Controller and its project manager will contact and call back by email or phone the interested, subscribing Data Subjects and provides them with information about the Project and the terms and conditions of sale of apartments of the Project.</p> <p>For this purpose, it is necessary for the interested Data Subject to provide their name, telephone number and email address (hereinafter: Contact data) on the Website or by other means, which data is processed by the Data Controller for the above purpose.</p>	<ul style="list-style-type: none"> <li>- name,</li> <li>- phone number</li> <li>- e-mail address</li> <li>- which apartment the Data Subject was interested in</li> </ul>	<p>Voluntary, specific and unambiguous consent of the data subject Article 6 paragraph (1) point a) of GDPR</p>	<p>For 6 months after subscribing on the Website or by other means, or after providing data, but at maximum until the consent of the Data Subject is withdrawn, or until the conclusion of the (pre)purchase agreement.</p> <p>After that - if the processing of personal data is not permitted for other purposes - the personal data will be anonymized, the Data Controller will not process personal data after that, only the date and which apartment a person - who can no longer be identified - was interested in.</p>

2.2	If the Data Subject enters a contract in relation to one of the properties of the Project (apartment, storage car parking space), in this case, the Data Controller or project manager will keep or contact the Data Subjects during the sale or the conclusion of the contract via the Contact data provided, in order to fulfill the contract, as well as process the personal data that shall be included in the sales contract by law and data of the property that is the subject of the sale for the preparation and execution of the (preliminary) sale and purchase agreement and the land registry procedure and registration.	<ul style="list-style-type: none"> <li>- name,</li> <li>- phone number</li> <li>- e-mail address</li> <li>- details of the purchased property,</li> <li>- the following personal data required for the conclusion of the contract (land registry registration), which shall be included in the sales and purchase agreement by law: name, birth name, mother's maiden name, address, place and time of birth, identity card number, personal identification number, tax identification number, citizenship, signature.</li> </ul>	Completion of the (preliminary) sale and purchase agreement Article 6 paragraph (1) point b) of GDPR.	5 years after the performance of the contract, the transfer of possession of the real estate, or at the latest 6 months after the expiration of the statutory warranty period.
2.3	If the Data Subject enters a contract in relation to one of the properties of the Project (apartment, storage car parking space), in this case the Data Controller processes data for accounting and invoicing purposes.	<ul style="list-style-type: none"> <li>- name,</li> <li>- address</li> <li>- details of the purchased apartment</li> </ul>	Fulfilling the legal obligation of the Data controller Article 6 paragraph (1) point c) of GDPR.	The documents considered to be accounting documents and the personal data contained therein shall be kept for 8 years based on section 169 of the Act 2000 on Accounting.
2.4	In the event of the conclusion of the (preliminary) sale and purchase agreement process personal data for the purpose of enforcement the arising legal claims.	<ul style="list-style-type: none"> <li>- name,</li> <li>- phone number</li> <li>- e-mail address</li> <li>- birth name</li> <li>- mother's maiden name</li> <li>- address</li> <li>- place and time of birth</li> </ul>	Legitimate interest of Data controller Article 6 paragraph (1) point (f) of GDPR	Until the expiration of the time for asserting a claim, 5 years from the date of fulfillment.

2.5 The Data Subject may withdraw its consent to the processing of its personal data for the purpose of data process specified in point 2.1 at any time, without justification or limitation, free of charge as follows, provided that the withdrawal of consent does not affect the legality of data processing based on consent, prior to the withdrawal:

- in writing, in a statement sent by post to GPM Kft (headquarters: 1068 Budapest, Benczúr u. 11. VI.2.),
- in an electronic mail sent to the email address [info@gpm.hu](mailto:info@gpm.hu) .

### **III. Data processing, data transmission**

The Data Controller transfers the personal data for the data process purposes specified in points 2.1 and 2.2 to the project manager of the Data Controller, GPM Kft (headquarters: 1068 Budapest, Benczúr u. 11. VI.2.) as a data processor.

The employees of the Data Controller and the data processor are entitled to know, manage and process the personal data of the Data Subjects necessary for the performance of their job duties.

For the purpose of data process defined in point 2.2, the Contact data and the data of the property are transferred to the common representative of the condominium in order to fulfill the contract, as well as for the purpose of asserting warranty and guarantee claims to the contractor obliged to provide a guarantee or warranty. The personal data provided to prepare and fulfill the (preliminary) sale and purchase agreement will be transferred to the legal representative appointed by the Data Controller in order to prepare the contracts and act in the land registry procedure.

### **IV. Rights of the Data subjects**

The Data Subject is entitled to the following data subject rights, which are detailed in the chapter XIII. of the general privacy policy available on the website of the Data Controller.

- right to information
- right of access
- right to rectification
- right to erasure - right to be "forgotten".
- right to restriction of data processing
- right to data portability (in case of data processing according to points 2.1 and 2.2)
- right to object (in case of data processing according to point 2.4)
- right to complain to a supervisory authority
- right to judicial remedy

### **V. Data security**

Taking into account the provisions of Article 32 of the GDPR, the Data Controller implements appropriate technical and organizational measures in order to guarantee a level of data security commensurate with the degree of risk, including the prevention of accidental or unlawful destruction, loss, alteration, unauthorized disclosure or unauthorized access to personal data.