

Data Processing Notice

This policy (hereinafter referred to as the "Policy") applies to the AVICO Group brand name and AVICO Group Kft. AVICO Elor Kft., AVICO Invest Kft., AVICO Green Kft. AVICO Future Kft., AVICO Park Alfa Kft. and AVICO Park Beta Kft. and any other business association belonging to the AVICO Group (hereinafter collectively referred to as 'project' or 'projects') (hereinafter collectively referred to as '**AVICO Group**') concerning any information relating to identified or identifiable natural persons (hereinafter referred to as 'personal data').

With this Notice, AVICO Group, which sells real estate development projects under the AVICO Group brand name, informs visitors to the avicogroup.hu website (hereinafter referred to as the 'Website') (hereinafter referred to as 'Data Subjects') about the personal data it processes, its practices regarding the processing of personal data, the organisational and technical measures it has taken to protect personal data, and the Data Subjects' rights. 'Data Subjects') about the personal data it processes, its practices regarding the processing of personal data, the organisational and technical measures it has taken to protect personal data, and the rights of Data Subjects. Our data processing practices are based on Act CXII of 2011 on the right to self-determination and freedom of information, as well as Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (hereinafter referred to as the 'General Data Protection Regulation') on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (hereinafter referred to as the 'General Data Protection Regulation').

AVICO Group reserves the right to unilaterally amend this Notice, subject to the restrictions set out in the relevant legislation and, where necessary, to inform the data subjects in advance in a timely manner. In its communications regarding this Notice and data protection issues, as well as in its other communications with data subjects, AVICO Group may use the contact details of data subjects available to AVICO Group for the purposes of contacting and communicating with them.

I. Name of the data controller

The data controllers

- **AVICO Group Ingatlanforgalmazó Korlátolt Felelősségű Társaság** (abbreviated name: AVICO Group Kft., registered office: 1133 Budapest, Váci út 76. 2nd floor, company registration number: 01-09-270167)
- **AVICO Elor Ingatlanforgalmazó Korlátolt Felelősségű Társaság** (abbreviated name: AVICO Elor Kft., registered office: 1133 Budapest, Váci út 76. 2nd floor, company registration number: 01-09-417479)
- **AVICO Invest Korlátolt Felelősségű Társaság** (abbreviated name: AVICO Invest Kft., registered office: 1133 Budapest, Váci út 76. 2nd floor, company registration number: 01-09-393615)
- **AVICO Green Korlátolt Felelősségű Társaság** (abbreviated name: AVICO Green Kft., registered office: 1133 Budapest, Váci út 76. 2nd floor, company registration number: 01-09-427037)
- **AVICO Future Korlátolt Felelősségű Társaság Company** (abbreviated name: AVICO Future Kft., registered office: 1133 Budapest, Váci út 76. 2nd floor, company registration number: 01-09-450132)
- **AVICO Park Alfa Ingatlanforgalmazó Korlátolt Felelősségű Társaság** (abbreviated name: AVICO Park Alfa Kft., registered office: 1133 Budapest, Váci út 76. 2nd floor, company registration number: 01-09-871982)
- **AVICO Park Beta Ingatlanforgalmazó Korlátolt Felelősségű Társaság** (short name: AVICO Park Beta Kft., registered office: 1133 Budapest, Váci út 76, 2nd floor, company registration number: 01-09-869849)

email: info@avicogroup.hu, tel: +36 1 231 0500, data controllers hereinafter collectively referred to as 'AVICO Group').

II. Data processors

Data processors are natural or legal persons who process personal data relating to data subjects on behalf of the AVICO Group on the basis of a written contract concluded with the AVICO Group. The AVICO Group uses data processors in the course of data processing. Data processors do not make independent decisions; they are only entitled to act in accordance with the contract concluded with the data controllers and the instructions received.

Data processors:

- MailChimp: c/o The Rocket Science Group, LLC (675 Ponce De Leon Ave NE; Suite 5000; Atlanta, GA 30308 USA; www.mailchimp.com; MOSS No. EU 826 477 914) Activity performed: sending eDMs
- MárkaMűhely Kft. (registered office: 1072 Budapest, Klauzál tér 9., company registration number: 01-09-366079), activity performed: advertisement management, technological support and website development
- Beyond Visual Korlátolt Felelősségű Társaság (registered office: 2045 Törökbálint, Határ utca 1., company registration number: 13-09-212722) activity: development of apartment selection software embedded in the website
- Sales representatives
- Authorised law firm (Havas & Ghete Law Firm, registered office: 1126 Budapest, Márvány u. 27. 4. em. 40.)

III. Data subjects

Natural persons who visit the Website, request a quote, enter into a contract, subscribe to the newsletter, are recipients of circular emails, or visit the AVICO Group's social media pages.

IV. Scope of data processed

1. Data processing in connection with requests for quotations:

- IP address of the data subject's computer
- time of visiting the website, address of the previously visited page, data related to the data subject's operating system and browser
- Name
- e-mail address
- telephone number
- message sent by the enquirer
- size of the property sought
- age
- purpose of purchase
- parameters of the property sought (size, number of rooms, etc.)
- how you came into contact with the AVICO Group project
- amount of own funds available for purchase
- planned loan amount
- whether you wish to apply for CSOK
- which project you are interested in
- How did you hear about us?

2. Purpose and legal basis of data processing:

In the case of preliminary consultation and requests for quotations, the legal basis for data processing is Article 6(1)(a) and/or (b) of the GDPR, based on the consent of the Data Subject and/or taking steps at the request of the Data Subject prior to entering into a sales contract between the Data Controller and the Data Subject, and increasing the efficiency of sales activities and optimally serving customer needs, i.e.:

- Providing the Data Subject with offers relating to real estate sold under the AVICO Group brand name by email and/or telephone,
- informing the Data Subject about real estate projects to be promoted under the AVICO Group brand name, related services and products by sending newsletters and offers by email and/or telephone,
- mapping the needs of interested parties, conducting market research and customer satisfaction surveys,
- processing data for statistical purposes in order to prepare market analyses and optimise services,
- operating and promoting the Website, monitoring the operation of the service, and preventing abuse.

3. In the case of a request for quotation, 5 years following the request for quotation (general limitation period for enforcement). Upon expiry of the general limitation period available for enforcement or the longer retention period specified by law, personal data shall be deleted immediately and irretrievably.
4. Recipients of data: Hosting provider, Sales representative, Enterprise resource planning system provider

V. Data processing in connection with the conclusion and performance of a sales contract

1. Due to its real estate sales activities, AVICO Group processes personal data for the purpose of concluding and performing sales contracts. Contracts may also be concluded with the assistance of the Data Controllers' sales representatives. The Data Controllers endeavour to process only the personal data necessary for the performance of the contract. The Data Controllers process the personal data obtained during the conclusion and performance of the contract as follows:

Personal data

- surname and first name, title, birth name, place and date of birth,
- address/place of residence, nationality, mother tongue, mailing address,
- tax identification number, serial numbers of personal identification documents,
- telephone number, e-mail address, data related to the property being sold
- , real estate registration and technical data,
- purchase price, payment schedule, source and amount of financing,
- other data specified by the contracting parties in the purchase agreement
- other data

If the Data Subject uses the "Request for Offer" option on the Website and at the same time declares their acceptance of the provisions of this data processing information, they give their consent to AVICO Group processing the data provided and, following personal contact, the data voluntarily provided by them in accordance with the conditions set out in this notice.

2. Purpose and legal basis of data processing:
In the case of contracts, the preparation of the conclusion of the (preliminary) purchase agreement, the differentiation of customers from each other, the performance of the (preliminary) purchase agreement concluded between the Data Controller and the customer, its execution, the provision of the performance undertaken under the contract, the verification of the obligations and rights undertaken in connection with the contract, maintaining contact, the enforcement, collection and sale of any claims that may arise in connection with the contract. The legal basis for the above is the performance of the contract between the Data Controller and the data subject pursuant to Article 6(1)(b) of the GDPR, the enforcement of rights or claims, and the processing of the contact details of legal entities pursuant to Article 6(1)(f) of the GDPR in the legitimate interests of the Data Controller.
3. Duration of data processing:
5 years after the conclusion of the contract (general limitation period for the enforcement of rights). Pursuant to Government Decree 181/2003. (XI. 5.) on mandatory guarantees related to housing construction, with regard to the enforcement of possible warranty claims, 10 years from the date of transfer of ownership of the property.
4. Recipients of data: Hosting provider, sales representative, enterprise resource planning system provider, authorised law firm

VI. Transfer of processed data, access by third parties

1. The Data Controllers shall not transfer the processed personal data to persons based in Hungary, Europe or third countries. If proceedings are initiated before a court or other authority, in the course of which it becomes necessary to transfer personal data to the court or authority, the court or authority shall also have access to the personal data.

VII. Additional data processed by the Data Controller (use of cookies)

1. In order to provide a personalised service, AVICO Group places a small data package (a so-called "cookie") on the computer or mobile device of visitors to the Website. The purpose of cookies is to ensure the highest possible quality of the Website, to provide personalised services and to enhance the user experience. Visitors to the Website can delete cookies from their computers or set their browsers to disable cookies. By disabling cookies, visitors acknowledge that the Website will not function fully without them.
AVICO Group never uses the information stored by cookies to identify visitors to the Website.
2. When the Website loads, the following information flashes: "***We consider data protection important. We use cookies to enhance your browsing experience, display personalised advertisements or content, and analyse traffic at . By clicking on the "Accept all" button, you consent to the use of cookies.***" By ticking the checkbox next to the pop-up text ("Accept all"), the Data Subject declares that they have read, understood and accepted the information (including the use of cookies), or by clicking on the "Customise" checkbox "Customisation", the Data Subject can set which cookies they allow or block while visiting the Website.

VIII. Website operator

1. The Website is operated by AVICO Group and MárkaMűhely Kft., and the data is stored on a secure server. AVICO Group will only transfer the personal data provided by the Data Subject to third parties in accordance with express legal requirements or at the request of the Data Subject.

IX. Newsletter and social media

1. In order to promote the real estate sales activities of the AVICO Group, it sends newsletters in electronic form (e-mail) to those who subscribe to the newsletter on the Website or in person.

In the case of newsletters, the scope of personal data processed is as follows:

- surname and first name,
 - e-mail address,
 - language of communication
2. The purpose and legal basis of data processing in the case of newsletters:
 - sending newsletters by email, promoting current discounts
 - possibly telephone enquiriesbased on the voluntary consent of the Data Subject (GDPR Article 6(1)(a)).
 3. By subscribing to the newsletter on the Website, the Data Subject gives their express and unambiguous consent to the sending of the newsletter. The Data Subject may unsubscribe from the newsletter at any time; a direct link is provided in every newsletter for this purpose.
 4. In the case of social media sites, data processing is carried out on the social media site in accordance with the provisions specified by the data controller of the social media site. The data processing of the hosting provider is governed by its own data processing provisions.

X. Circular

1. For Data Subjects with whom they have entered into a business relationship through real estate sales activities (conclusion of a real estate purchase agreement), they may send a so-called circular letter in the form of an email for the purpose of promoting their real estate sales activities and fulfilling their obligations under purchase agreements.
2. In the case of circulars, the scope of the data processed is as follows:
 - surname and first name,
 - e-mail address,
 - language of communication

3. Purpose and legal basis of data processing in the case of circulars:
 - Sending newsletters by email, promoting current discounts, fulfilling obligations under sales contracts
 - Possible telephone enquiriesthe legitimate interest of the data controller AVICO Group (GDPR Article 6(1)(f)).

XI. Data processed during communication:

1. In order to perform the contract and manage the contractor's work, it is essential to establish appropriate communication, for which purpose Avico Group has created and maintains an electronic register in its internal system of those requesting quotations, buyers concluding sales (preliminary) contracts and their contact details.
2. Purpose and legal basis of data processing:
 - maintaining contact by e-mail and telephone
 - mandatory execution of offers and contractual commitments, ensuring rightslegitimate interest in the pursuit of appropriate economic activity and in fulfilling the request of the data subject (GDPR Article 6(1)(f)).

XII. Data security, organisational and technical measures

The AVICO Group and data processors are only entitled to access your personal data to the extent necessary for the performance of their duties. The Data Controller shall take all security, technical and organisational measures to ensure the security of the data

1. Organisational measures

AVICO Group grants access to its IT systems on the basis of personal authorisation. Access is granted in accordance with the "principle of necessary and sufficient rights", i.e. all users may only use the Data Controller's IT systems and services to the extent necessary to perform their tasks, with the appropriate authorisation and for the necessary period of time . Access rights to IT systems and services may only be granted to persons who are not subject to restrictions for security or other reasons (e.g. conflicts of interest) and who have the professional, business and information security knowledge necessary for their safe use. The Data Controller and data processors undertake strict confidentiality rules in a written statement and are obliged to act in accordance with these confidentiality rules in the course of their activities.

2. Technical measures

The Data Controller stores the data on its own devices in a data centre, with the exception of data stored by data processors. The IT devices storing the data are kept by the Data Controller in a separate, locked server room, protected by a multi-level access control system.

XIII. Rights of data subjects

In accordance with the law, all Data Subjects may request the following in relation to their data:

- **access** to their personal data (the Data Controller shall inform the data subject whether data processing is in progress and, if so, provide information about it),
- **correction** of personal data (if the processed data is inaccurate or incomplete, the Data Controller shall correct or supplement it at the request of the data subject),
- **the erasure (forgetting)** of their personal data (if the personal data is no longer needed, the personal data must be erased in order to comply with a legal obligation applicable to the Data Controller, or if the data processing would not be lawful, the Data Controller shall erase the personal data),
- **restriction of** the processing of the data concerned (in the event of inaccurate, unlawful or unnecessary data processing alleged by the data subject or effective objection to the data processing, the Data Controller shall process the data, with the exception of storage, only

with the consent of the data subject or for the protection of the rights of the Data Controller or other natural or legal persons, or for reasons of important public interest),

- **portability** of personal data (the data subject shall receive the personal data concerning him or her, which he or she has provided to a data controller, in a structured, commonly used and machine-readable format, and you are also entitled to transfer these personal data to another data controller without being prevented from doing so by the data controller to whom you have provided your personal data to . You may exercise this right if the data processing is based on consent or a contract and the data processing is carried out by automated means), and **you may object** to the processing of your personal data (at your request, AVICO Group will cease processing your data unless AVICO Group can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms, or which are related to the establishment, exercise or defence of legal claims)

The Data Subject may exercise their rights by contacting AVICO Group at one of its specified contact details and specifying precisely which data they wish to exercise their rights in relation to.

XIV. Legal remedy

1. The Data Subject may contact AVICO Group with any questions, comments or complaints regarding data processing at info@avicogroup.hu or by calling +36 1 231 0500.
2. In the case of any request to exercise the rights of a data subject, AVICO Group is obliged to inform the data subject of the measures taken in response to the request without undue delay, but in any case within one month of receiving the request. If necessary, taking into account the complexity of the request and the number of requests, this deadline may be extended by a further two months. However, AVICO Group is obliged to inform the Data Subject of the extension of the deadline within one month of receipt of the request, stating the reasons for the delay.
3. If AVICO Group does not take action on the Data Subject's request without delay, but no later than one month after receipt of the request, it shall inform the Data Subject of the reasons for not taking action and that the Data Subject may lodge a complaint with the Authority and exercise their right to judicial remedy before the court of competent jurisdiction according to their place of residence or stay (information on the availability of courts can be found at the following link: <http://birosag.hu/torvenyszekek>).
4. If AVICO Group has reasonable doubts about the identity of the Data Subject when submitting a request to exercise a Data Subject's right, AVICO Group may request you to provide additional information necessary to confirm your identity. If AVICO Group proves that it is unable to identify the Data Subject, it may refuse to comply with the request to exercise the Data Subject's rights.
5. As a general rule, information and action relating to requests from data subjects is free of charge. However, if the request is clearly unfounded or excessive, in particular because of its repetitive nature, the data controller may charge a reasonable fee for the administrative costs of providing the requested information or communication or taking the requested action, or may refuse to act on the request. However, the burden of proving that the request is manifestly unfounded or excessive lies with AVICO Group.
6. If AVICO Group fails to comply with a request from the Data Subject in a verifiable manner, taking into account the above deadlines, the Authority shall investigate the matter on the basis of a complaint.

In the event of a grievance regarding the processing of their data, the Data Subject may submit a petition to the National Authority for Data Protection and Freedom of Information or bring an action before the court with jurisdiction over their place of residence (place of stay).

Name: National Authority for Data Protection and Freedom of Information

Registered office: 1055 Budapest, Falk Miksa u. 9-11.

Website: www.naih.hu

Telephone: +36 (1) 391-1400

Email: ugyfelszolgalat@naih.hu

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AVICO Group Kft.
AVICO Elor Kft.
AVICO Invest Kft.
AVICO Green Kft.
AVICO Future Kft.
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