

PRIVACY POLICY

The **Investment House Korlátolt Felelősségű Társaság** (registered seat: 1016 Budapest, Gellérthegy u. 17.; comp.reg.no.: 01 09 984485; tax identification no.: 23921601-2-41) (hereinafter referred to as: **Date Controller**) with present Privacy Policy fulfill the preliminary notification obligation prescribed in the Section 20. of Act CXII of 2011 on Informational Self-Determination and Freedom of Information (hereinafter referred to as: **Privacy Act**) in relation with the www.mycity-group.com website (hereinafter referred to as: **Website**).

I. Principles of data processing

Personal data may be processed only for specified and explicit purposes, where it is necessary for the exercising of certain rights and fulfilment of obligations. The purpose of processing must be satisfied in all stages of data processing operations; recording of personal data shall be done under the principle of lawfulness and fairness. The personal data processed must be essential for the purpose for which it was recorded, and it must be suitable to achieve that purpose. Personal data may be processed to the extent and for the duration necessary to achieve its purpose.

In the course of data processing, the data in question shall be treated as personal as long as the data subject remains identifiable through it. The data subject shall – in particular – be considered identifiable if the data controller is in possession of the technical requirements which are necessary for identification.

The Data Controller acts in compliance with the data security compliances defined in Section 7. of Privacy Act.

II. Purpose of data processing

The purpose of data processing is to give information about the Real Estates and the Services to the Clients who are interested in buying the Real Estates which are in the website and avail oneself of other Services, communication with the Clients, Recalling the Clients, give answers to the questions asked by the clients and further to handle all the business management.

Data processing is relating to the personal data of those who are in customer relationship under the Subsection (3) a) of Section 65. of the Privacy Act.

III. Legal basis of data processing

Personal data may be processed only when the data subject (hereinafter referred to as: **Data Subject**) given his consent under the Subsection (1) a) of Section 5. of Privacy Act. The Data Subject gives the following data to the Data Controller in purpose of client contact:

- Name
- E-mail Address
- Telephone number

The Data Subject gives his consents to the data processing with providing the above data and using the website. The contribution covers the collection, recording, organization, storage, use, deletion or destruction of the data too.

The Data Subject voluntarily gives his above personal data by filling out the “Contact” site of the website, which only has access to the Data Controller. The Data Controller undertakes an obligation of strict confidentiality relating to the personal data under his management without temporal limitation, those may not be discloses to third parties unlike the consent of the Data Subject.

Data Controller under the regulations of the Section 20. of Privacy Act, before the data processing, shall be obliged to notify preliminary, obviously and detailed with the statement of present Privacy Policy the Data Subject about every fact relating to the personal data processing. The Data Subject can cognizes present Privacy Policy on the Website, and declaring about the acceptance by marking the checkbox on the Contact site.

Data Controller shall process data of the Data Subjects relating to sending newsletter, or marketing who obviously and especially gives consent. The contribution can be freely withdrawn without any limitation or justification.

The Website, in purpose of customized service may place small packet of data (cookie) on the visitor’s computer. The purpose of the cookie is to ensure the higher level of operation of the given website in order to increase the user experience. The user is able to delete the cookies from his own computer, and can also adjust his browser to forbid the cookies. By forbidding the cookies, the user acknowledges, that without the cookies, the operation of the given website is not complete.

V. Data processor

In order to operate the IT system for the site basis, and among sales support of the property developments undertaken by the Data Controller, the Data Controller under the Section 10. of Privacy Act shall enlist the following data processors

- **Rackforest Kft.** (registered seat: 1116 Budapest, Sáfrány u. 6.) – server hosting activity
- **DH Projekt Kft.** (registered seat: 1016 Budapest, Gellérthegy u. 17.) – marketing- and sale support activity

The Data Subjects acknowledges the activities of the above Data processors and give explicit consent to that.

VI. Period of the data processing

Personal data processing of the Data Subject starts with giving the data and ends with deleting data by the Data Controller. The Data Subject shall be entitled to request the deletion of personal data in any time.

The Data Subject may request from the Data controller

- a) information on his personal data being processed
- b) the rectification of his personal data, and
- c) to erasure or blocking of his personal data, save where processing is rendered mandatory.

Upon the Data Subject's request the Data Controller shall provide information concerning the data relating to him, including those processed by a data processor on its behalf or according to his/her notice, the sources from where they were obtained, the purpose, grounds and duration of processing, the name and address of the data processor and on its activities relating to data processing, and the conditions and effects of the data incident and measures taken with a view to eliminate them and –in case of data transfer – the legal basis and the recipients.

Data Controllers must comply with requests for information without any delay, and provide the information requested in an intelligible form, in writing at the data subject's request, within not more than twenty-five days.

The information shall be provided free of charge for any category of data once a year. Additional information concerning the same category of data may be subject to a charge.

The Data Controller may refuse to provide information to the data subject in the cases defined under Subsection (1) of Section 9 and under Section 19 of Privacy Act.

VI. Remedies

Data Subject in case of possible infringement may go to the Hungarian National Authority for Data Protection and Freedom of Information under the regulations of the Privacy Act and can enforcing claims before courts.

Contact information of the Hungarian National Authority for Data Protection and Freedom of Information:

Registered seat: 1125 Budapest, Szilágyi Erzsébet fasor 22/C.

Website: <http://www.naih.hu>

Phone number: 06 1 391 1400

Fax: 06 1 391 1410

E-mail: ugyfelszolgalat@naih.hu

If the data subject disagrees with the decision taken by the controller under Subsection (2) of Section 21 of Privacy Act, or if the controller fails to meet the deadline specified in Subsection (2)

of Section 21. of Privacy Act, the data subject shall have the right under Section 22 of Privacy Act to turn to court within thirty days of the date of delivery of the decision or from the last day of the time limit. The action shall be heard by the competent tribunal. If so requested by the Data Subject, the action may be brought before the tribunal in whose jurisdiction the Data Subject's home address or temporary residence is located.

The Data Controller reserves the right to modify unilaterally present Privacy Policy. Data Controller publishes the valid version of present Privacy Policy on the Website. The Data Subject accepts the modified privacy policy by using the services provided by the Data Controller or by implicit conduct.

Budapest, 01/04/2016.