

DATA MANAGEMENT NOTICE

Faedra III. Ingatlanfejlesztő Alap (hereinafter: Fadera III. Real Estate Development Fund) informs visitors to the website www.ligetvilla.com about the personal data it processes, its practices related to the handling of personal data, the organizational and technical measures it has taken to protect personal data, as well as the rights of the data subjects.

Our data management practices are based on Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information (hereinafter: Infotv.), and on Regulation (EU) 2016/679 of the European Parliament and of the Council (hereinafter: GDPR) on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, which repeals Directive 95/46/EK.

1. Data Manager

Faedra III. Real Estate Development Fund (registration number in the records of the Hungarian National Bank: 1222-67, registered office: 1132 Budapest, Váci út 22–24., 5th floor, statistical number: 19396697-4120-915-01, tax number: 19396697-2-41), **managed by Faedra Alapkezelő Zártkörűen Működő Részvénytársaság** (hereinafter: Faedra Fund Management Private Limited Company), (registered office: 1132 Budapest, Váci út 22–24., 5th floor, statistical number: 27780798-6630-114-01, tax number: 27780798-2-41, company registration number: 01-10-141781), represented by **Nikolett Majorosi**, Chief Executive Officer (hereinafter: *Data Manager*)

2. Purpose of Data Processing, Legal Basis of Data Processing, Scope of Data Processed, Duration

Purpose of data processing	Legal basis	Scope of data processed	Duration
2.1. Contacting the data subject upon their initiative, maintaining communication	GDPR Article 6 (1) (a) - voluntary consent of the client	Personal data provided by the data subject when requesting contact (e.g. email address, phone number, message sent by the requester, characteristics of the requested property)	Until consent is withdrawn, but no longer than five (5) years from the date of declaration.
2.2. Offering real estate properties developed under the “Liget Villa” brand to the data subject, introducing related services via email and/or telephone;	GDPR Article 6 (1) (a) - voluntary consent of the client	Personal data provided by the data subject	Until consent is withdrawn, but no longer than five (5) years from the date of declaration.

	customer satisfaction inquiries, customer relationship follow-up via email or telephone.		(e.g. email address, phone number, property size sought)	
2.3.	Performance and execution of registration agreements, preliminary sales contracts, or sales contracts concluded between the Data Subject as Buyer and the Data Manger as Seller	GDPR Article 6 (1) (b) - processing necessary for the performance of a contract	Data recorded in the contract (name, birth name, mother's name, place and date of birth, address, mailing address, personal identification document number, personal identification code, tax identification number, email address, phone number, nationality)	Five (5) years from the termination of the contractual relationship.
2.4.	Customer due diligence as prescribed by Act LIII of 2017 on the Prevention and Combating of Money Laundering and Terrorist Financing (Pmt.)	Mandatory data processing required by Act LIII of 2017 (Pmt.)	ame, birth name, address, mother's name, place and date of birth, nationality, type and number of identification document; in the case of foreign natural persons, place of residence	Eight (8) years from the termination of the business relationship.
2.5.	Obligation to retain accounting records	Act C of 2000 on Accounting, Section 169§ (2) – obligation to retain accounting records	Client's name, address, invoice amount	Five (5) years from the date of issuance of the accounting document.

3. Data Transfer

In the case specified in Section 2.3 of this Notice, the Data Manager is entitled to process the Data Subject's data for the implementation of the project and the execution of the contract – in particular

for the construction of the residential building, the establishment of the condominium, the individual subdivision of properties, obtaining occupancy and other permits, providing collateral to the financing bank, enforcing warranty claims, utility connections, or registering the Data Subject's ownership. For these purposes, the Data Manager may also transfer the data to cooperating third parties (financing bank, licensing authorities, utility providers, land registry authority, condominium management, lawyer involved in the sale and purchase) in order to achieve the above-mentioned objectives.

4. Data Processors

Data Processors are natural or legal persons who, under a contractual relationship with the Data Manager, process personal data related to the Data Subjects. The Data Manager engages Data Processors in the course of data processing. Data Processors do not make independent decisions and are authorized to act solely based on the contract concluded with the Data Manager and according to the instructions received.

Data Processor:

- Otthon Centrum Solutions Kft (registered office: 1023 Budapest, Lajos utca 28–32.; company registration number: 01-09-728100)
- Linemedia Kft.
székhely: 1141 Budapest, Komócsy utca 29-31., cégjegyzékszáma: 01-09- 940357
- Beyond Visual Kft.
székhely: 2045 Törökbálint, Határ utca 1., cégjegyzékszáma: 13-09-212722

5. Rights of Data Subjects

Data Subjects are entitled at any time to request information regarding the personal data processed about them by the Data Manager, to request their rectification, deletion, or restriction of use, and to object to the processing of their personal data, unless otherwise restricted by law. Data Subjects have the right to data portability, i.e., to receive a copy of their personal data in both machine-readable and conventional formats.

Data Subjects may at any time prohibit the further use of their personal data for purposes where the legal basis of data processing was their voluntary consent.

The Data Subject may exercise their rights by sending a letter to the registered office of the Data Manager or by email to ligetvilla@oc.hu.

By clicking on the unsubscribe link at the bottom of newsletters or offers sent by us, the Data Subject may prohibit the further sending of newsletters and offers. Please note that if a client wishes to

prohibit further email newsletters, offers, or other communications, the unsubscription must be carried out for each email address provided by them.

The Data Manager shall comply with the request within the shortest possible time, but no later than 15 days from the submission of the request.

6. Legal remedies

For any questions, comments, or complaints related to data processing, the Data Subject may contact the Data Manager by email at ligetvilla@oc.hu or by mail sent to the registered office.

In relation to the processing of their personal data, the Data Subject may lodge a complaint with the **National Authority for Data Protection and Freedom of Information (Nemzeti Adatvédelmi és Információszabadság Hatóság - NAIH)** (address: 1055 Budapest, Falk Miksa utca 9–11.; mailing address: 1363 Budapest, Pf.: 9.; email: ugyfelszolgalat@naih.hu; telephone: +36 (30) 683-5969, +36 (30) 549-6838, +36 (1) 391 1400; fax: +36 (1) 391-1410), or they may also turn to the competent court of law according to their place of residence.