PRIVACY POLICY

Effective: 4 December 2023

Contact details of the controller

In the operation of this website

COM PARK Ingatlanberuházási Korlátolt Felelősségű Társaság
Lechner Ödön fasor 6.
1095 Budapest
Phone: +36 1 501 28 00
E-mail: office@caimmo.hu

(hereinafter referred to as "**we**" or "**COM PARK**") acts as data controller within the meaning of the General Data Protection Regulation ("**GDPR**").

This privacy policy informs you about the way and extent to which we process your personal data when you visit our website. Unless otherwise stated in this privacy policy, we (or our processors) collect your personal data directly from you and do not obtain it from third parties.

We are aware of the importance of your data and therefore do not transfer it to third countries (*i.e.,* countries outside the European Economic Area) or to international organizations. If individual data processing operations nevertheless involve the transfer of your data to a third country, we will expressly notify you thereof in this privacy policy, including informing you of the measures we have taken to ensure the required level of protection for your data.

You are neither legally nor contractually obligated to provide your personal data. Furthermore, the provision of your personal data is not necessary for the fulfillment of a contract. You are not obligated to provide the personal data, but without this data the use of our homepage or individual functions thereof might not be possible.

We do not use your data for automated decision-making including profiling in the sense of Art. 13 para. 2 lit. f and Art. 14 para. 2 lit. g GDPR.

Due to the further development of our website or legal changes, it may become necessary to amend this privacy policy. The current version of privacy policy is published on the webpage, and this version shall apply.

Below you will find detailed information on the individual data processing operations.

Contact details of the data protection officer

You can contact our data protection officer directly at dsb@caimmo.com.

Recipients of your data

For the provision of our website, in particular for technical processing, we use service providers who process your personal data on our behalf (so-called "Processors").

Processors that support us in the context of the processing activities mentioned below are highlighted in the table below.

In addition, in some cases, your data may also be transferred to other third parties, which may be processors or independent data controllers. Such third parties are in particular:

– CA Immo Real Estate Management Hungary Kft. (registered seat: 1095 Budapest, Lechner Ödön fasor 6.; company registration number: 01-09-726650), which company assist us in achieving the purposes set out in this privacy policy;
– our consultants, such as lawyers, tax advisors and notaries;
– authorities and courts; and

- potential buyers, investors, insolvency administrators and other third parties who receive personal data in connection with an insolvency proceeding or in a transaction, such as a merger, sale of assets or shares, restructuring, financing, change of control or acquisition of all or part of our business in any other way.

Detailed information on the individual data processing activities in connection with the provision of the website

This website is operated with the assistance of third parties, as described in more detail below. Cookies or similar technologies may also be used in the provision of the website. For more information on the use of cookies, please refer to the following section at "Cookies & Tracking ".

Name of the data processing activity	Processed data	Legal basis of processing	Purpose of data processing	Storage duration	Recipients of the personal data
Borlabs Cookie Banner	Cookie duration; cookie version; WordPress website domain and path; consents; if consent is given to use cookies, a UID is also set (this is a random sequence of characters which is stored on your device, allowing it to be associated with that device so that we can recognize your browser and therefore your settings).	Legitimate Interest, pursuant to Art. 6 para. 1 s. 1 lit. f GDPR and Section 13/A 3 of Hungary's Act CVIII of 2001 on Electronic Commerce and on Information Society Services ("**E-Commerce Act**"), namely to provide a functional website, to provide the services you request, and to store your cookie settings.	To allow you to consent to the use of non-functional cookies or to refuse your consent, we use a cookie banner from Borlabs, which itself sets a cookie for its function. Through this, our cookie banner is displayed and you are given the option to choose. The tool then suppresses the setting of cookies that you have not consented to the use of.	6 months	The Borlabs Cookie Banner is operated on the servers on which the website is hosted. Website Provider: IACD Systemhaus GmbH, Höherweg 270, 40231 Düsseldorf, Germany Operator of the data center where the server is located: Interxion Deutschland GmbH, Hanauer Landstraße 298, 60314 Frankfurt am Main, Germany
Google Maps	Session_id; Google user ID to identify the individual; IP address; tracking profiles and motion analysis; settings such as preferred language; pages visited; screen and	Consent according to Art. 6 para. 1 s. 1 lit. a of the GDPR (Both for accessing and subsequent processing).	Purpose of data processing for COM PARK: Integration of the map material from Google Maps is done for the professional	At Google, according to is retention policy, advertising data is anonymized in server logs by deleting a portion of the IP address and cookie	Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland; Google Ireland Limited shares your data with

			presentation of the content of our website. We use this service to offer the location of the office building. When using Google Maps, your personal data are processed. Purpose of data processing for Google: Through the cookies set by Google, Google also processes data from you. Google also uses this for its own purposes, in particular to optimize its own services and to provide individual, personalized advertising and content for you. Google achieves this, among other things, by being able to assign you to a unique ID and this to your Google account, and can use this to track which websites you visit. By allowing the Google cookie on our website, Google also learns that you have visited it.	information after 9 respectively 18 months.	Google LLC, 1600 Amphitheatre Parkway Mountain View, CA 94043, USA, thus transferring it to the USA. We have concluded standard contractual clauses as appropriate safeguards in accordance with Article 46 (2) c) GDPR with Google for the protection of your data in the USA and, where applicable, other third countries. The model standard contractual clauses can be viewed here. Furthermore, we only use this service with your consent. Google. LLC is also certified in accordance with the "Data Privacy Framework" and therefore benefits from the European Commission's adequacy decision on the EU-US Data Privacy Framework. You can find more information on data processing by Google here.
window resolution; and other data.					
Google Fonts	IP address of the visitor	Consent according to Art. 6 para. 1 s. 1 lit. a of the GDPR (Both for accessing and subsequent processing).	Purpose of data processing for COM PARK: Integration of the Google Fonts service is done for the professional presentation of	At Google, according to is retention policy, advertising data is anonymized in server logs by deleting a portion of the IP address and cookie information after 9 months.	Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland; Google Ireland Limited shares your data with

			the content of our website. When using Google Fonts, your personal data are processed. Purpose of data processing for Google: Google Fonts do not set any cookies. However, it is a web font service that provides Google with the user's IP address in order to generate the fonts.		Google LLC, 1600 Amphitheatre Parkway Mountain View, CA 94043, USA, thus transferring it to the USA. We have concluded standard contractual clauses as appropriate safeguards in accordance with Article 46 (2) c) GDPR with Google for the protection of your data in the USA and, where applicable, other third countries. The model standard contractual clauses can be viewed here. Furthermore, we only use this service with your consent. Google. LLC is also certified in accordance with the "Data Privacy Framework" and therefore benefits from the European Commission's adequacy decision on the EU-US Data Privacy Framework. You can find more information on data processing by Google here.
Contacting us via e-mail, phone or mail	<u>Via e-mail:</u> E-mail address, time of the message, metadata such as IP address, content of the communication including	Legitimate interest pursuant to Art. 6 para. 1 s. 1 lit. f GDPR, namely to receive and respond to the request	Processing your request to your satisfaction. In this regard, we will contact you by the communication channel you have chosen, by	Maximum for three years after the completion of the request.	Other undertakings that belong to the CA Immo Group, should the nature of the inquiry make it necessary.

	personal data contained therein such as name. Via phone: Phone number, time of your call, content of the communication including personal data contained therein, such as name. Via postal communication: Name, first name, address, date of your message, contents of the communication including personal data contained therein.	and to analyze the requests in order to improve the quality of our responses and services.	telephone, by post or by e-mail. To analyze requests in order to improve the quality of our responses and services.		

Cookies & Tracking

Cookies are small files that are stored on your end device (*e.g.,* PC/laptop, tablet or smartphone). These files are downloaded from your browser when you visit our website. If a cookie is not deleted automatically (for example, immediately after your visit to our website), the cookie and the information stored in it will be sent back to the respective website that generated it (first party cookie) or to another website to which it belongs (third party cookie), when you call up this website again with the same end device or browser. In this way, the website "recognizes" that it deals with the same user and enables the provision of certain functionalities, such as customizing the display of content on the website. Cookies can, for example, "remember" your preferences, tell how you use a page, and/or customize the offers displayed in part to your preferences.

Functional cookies. We use several functional cookies on our website. When we use functionally necessary cookies, we process your personal data in order to provide basic functions of our websites and the services you have requested, as well as to temporarily store your cookie settings. Without the use of these cookies, we would not be able to provide the website or there would be functional limitations.

Non-functional cookies. We use several non-functional cookies on our website. These cookies are not functionally necessary for the operation of our website and include, for example, cookies to analyze user behavior on websites, or cookies to show you advertisements.

More details on the processing of personal data through cookies. For more information on the cookies we use, the processing purposes, the types of data as well as storage duration and recipients, please refer to "Cookie settings". You can access this via clicking on the cookie banner tab at the end of the website.

Your data subject rights

As a data subject, you have the following rights in relation to the processing of your personal data:

Right to withdraw consent

If we process your data based on your consent, you are entitled to withdraw your consent at any time. After receiving your withdrawal, we will no longer process this data. However, the withdrawal of consent will not affect the lawfulness of the processing carried out up to the time of the withdrawal.

Right of access

You can request information about the data processed about you, in particular about the origin and categories of the data processed, the storage period, the recipients to whom your personal data have been disclosed, the purpose and nature of the processing. Upon request, we will provide you with a copy of the personal data we process about you. We would like to point out that no information is to be provided if this would jeopardize business or trade secrets of the controller or third parties.

Right to rectification

If we process data about you that is incorrect or incomplete, you may request that it be corrected or completed - also by means of a supplementary declaration.

Right to erasure

You have the right to request that we delete the personal data concerning you.

We would like to point out that a right to deletion might not exist in specific cases, e.g. if we have to process the data in order to fulfill a legal obligation or in order to be able to assert, exercise or defend legal claims.

Right to restriction of processing
You have the right to request the restriction of the processing of your personal data carried out by us, for example, if the accuracy of the personal data is disputed by you, for a period of time that allows us to verify the accuracy of such personal data.

Right to data portability
If we process personal data about you that you have provided to us, you may, under certain circumstances, request that this data be transferred to you in a machine-readable format. You may also instruct us to transfer this data directly to a third party of your choice, if this is technically feasible.

Right to lodge a complaint
Although we make strong commitments to protect the privacy and integrity of your personal data, disagreements about the way we use your personal data cannot be ruled out. You therefore have the right to lodge a complaint with a data protection supervisory authority. This could be, among others, the supervisory authority at your place of residence or at our location.

The data protection authority responsible for us is the Hungarian National Authority for Data Protection and Freedom of Information (address: 1055 Budapest, Falk Miksa utca 9-11.; phone: +36-1-391-1400; e-mail: ugyfelszolgalat@naih.hu; website: www.naih.hu). However, we encourage you to contact us first if you have any questions or concerns about our processing of your personal data so that we can work together to find a solution.

RIGHT TO OBJECT
Even if the data concerning your person is correct and complete and is processed by us lawfully, you can object to the processing of this data at any time in special individual cases justified by you.

Contact
For all your data protection concerns, in particular to assert your rights, please contact us in writing (by letter or e-mail) at the contact details listed in the section "*Contact details of the data controller*". Alternatively, you can also contact our data protection officer directly (dsb@caimmo.com).