

Purpose and designation of data handling	Legal basis for data handling	Scope of data processed	Duration of data handling	Who has access to the personal data?
<p>For the preparation of a purchase agreement between you as client of Cordia Management, and the seller of the property you wish to purchase, in particular, providing information on the real estates you are seeking. Cordia Management provides a so-called 'sales management' service to sellers, within the scope of which is prepares the property purchase offer, followed by the purchase contract. The data is managed by Cordia Management jointly with Cordia Agent in a separate database ("Client Database").</p> <p>In connection with the fulfilment of the real estate purchase agreement, Cordia Management will forward customers' contact information (name, apartment, e-mail, telephone) to the condominium board president of the relevant condominium. The purpose of</p>	<p>Act V of 2013 on the Civil Code ("Ptk.") § 6:288. <i>[Intermediation Contract]</i> GDPR Section 6. Article (1) b) – processing is necessary for the performance of a contract to which the data subject (as a natural person) is party or in order to take steps at the request of the data subject prior to entering into a contract.</p>	<p>Information entered into the registration interface of the https://cordia.hu website, or by other means, for example on Facebook, Instagram, other social media sites, customer registration sheets or contacts from real estate advertising sites: name (first and last), e-mail address, telephone number, which project is of interest, what should be the date of delivery, what kind of apartment within a project (number of rooms, size, floor, orientation, other expectations), why you want to purchase the property (private purposes or as an investment), whether you'd like to use a loan, and any other information you provide for the preparation of the purchase contract. For example: comments, call-back requests and your proposed time for an appointment. Additionally, Cordia manages the status of your subscription to its</p>	<p>The relevant data will be deleted after 5 years following the termination / possible failure of the condominium management contract pursuant to Ptk § 6:22.</p> <p>For meeting tax obligations: the data retention period is 5 years from the last day of the calendar year in which the tax should have been declared or included in the tax return and should have been paid if the tax return was missing (Art. 78. § (3), 202. § (1)). If we are obligated to keep the data based on the Accounting Act, the data will be deleted after 8 years following the termination of the relationship. In practice, such cases are where the data is part of the supporting documentation for accounting activities, such as documents associated with conclusion of a contract (in some cases in the agreement itself) or are listed on the invoice.</p>	<p>The Cordia Management director of sales, deputy director of sales, their sales staff and the colleagues who prepare the purchase contracts, as well as staff operating the Client Database for Cordia Agent. Cordia Agent and Cordia Management belong to a single business group, whose purpose is the optimal operation of the entire business group. In the interests of this, they operate the Client Database jointly. The primary task of Cordia Agent is, with the help of the data in the Client Database, to offer loan information for the purchase of property. You may exercise your rights in accordance with the GDPR with respect to both Cordia Management and Cordia Agent.</p>

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<p>forwarding this data is for the condominium board presidents to be able to contact customers immediately concerning the daily tasks related to the condominiums. Customers may, of course, inform Cordia Management if they prefer to contact the condominium board president themselves.</p>		<p>newsletter so that it can know whether to send you one. This data serves as the prerequisite for the preparation, conclusion, and fulfilment of the contract. The priority of properties offered will be established based on the data provided. In a particular case, Cordia may send you offers upon your request that are similar to other real estates. For this, Cordia will need to know whether you want to buy the real estate for private purpose or as an investment, because Cordia will include this as well, in addition to other criteria, when selecting the real estates to be offered. Data handling does not have any other consequences. You are not obligated to provide the information, but in the absence of such, your requested loan and related financial services cannot be determined, loan notifications and other</p>		

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		related information cannot be provided and the agreement(s) cannot be prepared.		
<p>Data transfer to Cordia FM Társasházkezelő Korlátolt Felelősségű Társaság (“Cordia FM”)</p> <p>Data transfer occurs when you indicate on Cordia's website that you would like to use property management services, or services like property rental and real estate brokerage, or other services (furnishing, accountant mediation, etc.) related to the property management service. The purpose of data transfer is for Cordia FM to provide you an offer in connection to the above activities, after which a purchase agreement can be signed.</p> <p>Cordia FM contact details: 1082 Budapest, Práter utca 29/a fszt. 21.; ; + 36 1 411 3000;</p>	<p>Ptk. 6:272. § [<i>Contract of Services</i>]. Cordia FM contracts directly with the property owner as a landlord or user of property management services.</p> <p>GDPR Article 6, (1) b) – processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.</p> <p>Data management is a prerequisite for fulfilment of any contract related to property brokerage or property management activities. Data handling does not have any other consequences, but lacking data Cordia FM cannot perform its property</p>	<p>Data provided for the purpose of data handling “For the preparation of a purchase agreement between you as client of Cordia Management, and the seller of the property you wish to purchase”.</p> <p>Cordia FM acts as an independent data handler in accordance with the terms of its data handling policy. Contact: www.cordia.hu</p>	<p>Cordia FM will delete the relevant data 5 years after the termination of a lease, intermediary or other type of contract, or after the collapse of such a contract signing, based on Ptk § 6:22.</p> <p>For meeting tax obligations: the data retention period is 5 years from the last day of the calendar year in which the tax should have been declared or included in the tax return and should have been paid if the tax return was missing (Art. 78. § (3), 202. § (1)).</p> <p>If we are obligated to keep the data based on Section 169 of Act C of 2000 on Accounting (“Accounting Act”), the data will be deleted after 8 years following the termination of the relationship. In practice, such</p>	<p>The Cordia Management director of sales, deputy director of sales, their sales staff and the colleagues who prepare the purchase contracts.</p> <p>Those with data access within Cordia FM: The Cordia FM manager, as well as persons overseeing tasks related to property leasing, brokering and other activities.</p>

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	handling activities.		cases are where the data is part of the supporting documentation for accounting activities, such as documents associated with conclusion of a contract (in some cases in the agreement itself) or are listed on the invoice.	
<p>Opening an online account on one of Cordia's websites. You have the option of opening an online account with Cordia where you can keep the properties that interest you, made available through Cordia, in one place. You will also see whether they have been sold. You may request an offer for properties you have chosen among your favourites.</p>	<p>GDPR article 6, point 1 a) – your consent.</p>	<p>Information entered into the registration interface of the https://cordia.hu website: time of registration, name, e-mail address, telephone number, password, which apartments are of interest, sent offers on apartments. Providing a telephone number is optional: the goal is for Cordia sales staff to be able to reach you by telephone. If you are requesting an offer on a specific property, in the interests of communicating with you more rapidly, we will need “preparation of a purchase agreement between you as client of Cordia Management, and the seller of the property</p>	<p>You have a right to withdraw your consent at any time and to delete your account through the website. After clicking on the delete account button, you will receive a confirmation link at the e-mail address you provided which you must confirm in order to delete your account. Confirmation is important because Cordia must be sure that the person wishing to unsubscribe is not a robot, is acting in their own name, is confirming the request through their own e-mail account and is using a genuine e-mail address. The confirmation link is valid for 48 hours. The deadline to unsubscribe begins upon</p>	<p>The Cordia Management director of sales, deputy director of sales, their sales staff and the colleagues who prepare the purchase contracts.</p>

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		<p>you wish to purchase” according to the goal of the data handling. Without giving your telephone number, the purchase agreement between you and the seller of the property you would like to purchase cannot be prepared. The phone number is needed to ensure that the client can be reached quickly for making an appointment.</p> <p>The account can also be created through Facebook registration. In such a case, the handled data will be your Facebook ID, the e-mail address you provided to Facebook, and a secondary e-mail address (if you do not use the e-mail address you provided to Facebook.)</p>	<p>confirmation. If you do not confirm you intention to unsubscribe within 48 hours, the link will expire and a new one must be requested. Withdrawing your consent does not affect the legality of any consent-based data handling that took place prior to your withdrawal of consent. Following the deletion of your account, the account will be suspended and the data stored within it will be deleted.</p>	
<p>Sending marketing materials via e-mail and/or telephone (direct marketing) from Cordia; based on apartment-seeking preferences in the case of</p>	<p>Section 6 (1) of the Advertising Act 6Article 6 (a) of the GDPR on the basic conditions and certain terms of commercial advertising activity – prior,</p>	<p>Your name, e-mail address and telephone number. This data is recorded in the Client Database.</p> <p>Information relating to the</p>	<p>You may, at any time and without restriction or reason, revoke the consent you have provided for this data handling purpose (unsubscribe to</p>	<p>The staff operating the Cordia Management and Cordia Agent Client Database during the course of sending marketing materials, as well as the</p>

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<p>personalised advertising. Direct contact with clients interested in the purchase or rental of properties, and other services related to properties found on – among others the https://cordia.hu/ website – for the purposes of providing information on services via telephone or e-mail (newsletter).</p> <p>In connection with its services, Cordia Agent may also send information on loans via e-mail or telephone call for the purposes of informing clients of available offers.</p>	<p>specific and explicit consent of the data subject.</p> <p>Concerning the subject’s apartment-seeking preferences, Cordia will conduct profiling (GDPR section 22. point 1 c).</p> <p>The purpose of the aforementioned profiling is to survey the level of interest in Cordia’s projects and properties, to deliver personalised marketing materials to relevant persons, and to inform those persons of properties and projects which best meet their apartment-seeking preferences.</p>	<p>operation of the Client Database can be found in the first row of this table.</p> <p>When information is provided on the registration page of the https://cordia.hu/ website, as well as in the “sign up for our newsletter” fields.</p> <p>You are not obligated to provide the information, but we cannot send you marketing materials or loan notifications in the event you choose not to do so.</p> <p>The apartment-seeking preferences of the relevant subject, especially in the case of investments or home purchases for personal purposes, interest in the delivery, location and environment of the apartment (residence), for example, a suburban housing development, the target price of home purchase, and characteristics of a preferred</p>	<p>advertisements and loan information) via the contact details provided in this Policy.</p> <p>Withdrawing your consent does not affect the legality of any consent-based data handling that took place prior to your withdrawal of consent.</p> <p>When unsubscribing from advertising materials, a confirmation link will be sent to the e-mail address you’ve provided, which you must click to confirm your unsubscribe request. Confirmation is important because Cordia must be sure that the person wishing to unsubscribe is not a robot, is acting in their own name, is confirming the request through their own e-mail account and is using a genuine e-mail address. The confirmation link is valid for 48 hours. The deadline to unsubscribe begins upon confirmation. If you do not confirm the unsubscribe request within 48 hours, the</p>	<p>staff of Cordia Agent operating the Client Database with regard to sending of loan information.</p>

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		<p>residence as given by the client (for example, number of rooms).</p> <p>For example, Cordia will send personalised marketing materials (newsletter) about a new suburban project to someone who had earlier inquired about a previous suburban development.</p> <p>Source of data: https://cordia.hu/ (data stored in the Web Database), as well as home purchasing preferences and contact details provided to Cordia in other ways while requesting an offer, based on the subject and purpose of interest.</p>	link will expire and a new one must be requested.	
<p>Satisfaction survey following home purchase and use of Cordia services, in person, in writing, through e-mail or telephone.</p> <p>The goal of the above data management is to survey</p>	GDPR article 6, point 1 a) – your consent.	Contact information and other personal data provided by you, such as preferences, related to home purchasing and other Cordia services, as well as data related to use of those services. Within this context, Cordia would	<p>You may, at any time, withdraw your consent by sending a request to the contact details provided in this Cordia policy.</p> <p>Withdrawing your consent does not affect the legality of</p>	The staff that operate the Client Database for Cordia Management and Cordia Agent, and that manage data related to customer data sheets as well as satisfaction surveys.

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<p>client needs, to increase the standard of properties sold by and services provided by Cordia, and to track and respond to changes in the real estate market.</p>		<p>like to get to have your data which could be relevant to choosing properties and services. For example, social status, monthly income, reading habits, and satisfaction with Cordia services and received materials.</p>	<p>any consent-based data handling that took place prior to your withdrawal of consent.</p> <p>However, it may occur after withdrawing consent that Cordia is unable to fully take into account the needs of the client concerning individual properties or services.</p>	
<p>Customer information sent by e-mail from Cordia. Informing customers (with signed registration agreements, real estate purchase agreements, and in possession of a sales contract) who have purchased properties (found at https://cordia.hu/) sold by salespeople connected to the Cordia group, regarding the progress of Cordia project(s) and other important milestones affecting their property.</p>	<p>GDPR article 6, (1) f – legitimate interests of Cordia. Legitimate interest: proactively (proactive) informing of clients about the status of Cordia projects affecting their properties. The format of customer information is uniform, and gives information on the status of all Cordia projects under development, including projects affecting your property.</p>	<p>Your name (first and last), data of your property and data of the related Cordia project, and your e-mail address.</p>	<p>Until the completion of the given project.</p> <p>You may, at any time and without restriction or reason, revoke the consent you have provided for this data handling purpose (unsubscribe to advertisements and loan information) via the contact details provided in this Policy.</p>	<p>The Cordia Management staff that work to send the customer information.</p>
<p>Preparation of the loan and credit agreement by OTP Bank Nyrt. (“OTP Bank”)</p>	<p>Ptk. § 6:382 - § 6.415 <i>[Loan and credit agreements]</i></p>	<p>Your name (first and last), e-mail address and telephone number, and data</p>	<p>Personal data, as indicated in Act LIII of 2017 on prevention and combating of</p>	<p>The staff that operate the Client Database for Cordia Management and the Cordia</p>

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<p>related to the purchase contract between you, as a client of Cordia Management, and the sellers of the property you wish to purchase. A mobile agent of OTP Bank (headquarters: 1051 Budapest, Nádor u. 16. website and contact info: www.otpbank.hu and informacio@otpbank.hu) will send you loan information and other information related to your agreement in the interests of preparing your loan and credit agreement. Your name, e-mail address and telephone number is passed on to OTP Bank for this purpose.</p>	<p>GDPR Article 6, (1) b) – processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.</p>	<p>listed for data handling in “For the preparation of a purchase agreement between you as client of Cordia Management, and the seller of the property you wish to purchase.”</p> <p>The data serves as the prerequisite for the preparation, conclusion and fulfilment of the loan and credit agreement by OTP bank. You are not obligated to provide the information, but in the absence of such, your requested loan and related financial services cannot be determined, loan notifications and other related information cannot be provided, and the agreement(s) cannot be prepared.</p>	<p>money laundering and the financing of terrorism, OTP Bank – according to the referred provision of the law - must be kept for eight (8) years. According to §169 of the Accounting Act, OTP Bank payment receipts (including the general ledger accounts, the detailed and analytical records) directly and indirectly supporting accounting statements, and the personal data contained therein, must be maintained in human readable format for eight (8) years, searchable based on the records, and held by OTP Bank. In the case of non-concluded contracts, OTP Bank may manage personal data for a period of up to five (5) years in accordance with Ptk. 6:22. §. Detailed rules for data retention are contained in OTP Bank’s general business rules and the applicable business regulations.</p>	<p>Agent connected to data transfer for OTP Bank, as well as the sellers of the property.</p> <p>OTP Bank’s mobile agents in relation to sending of loan information and other information.</p>
<p>In the interests of development and operation</p>	<p>Ptk. Chapter XXXVII [<i>The business contract</i>]</p>	<p>Name, address, e-mail address and telephone</p>	<p>Data will be deleted after 5 years following the</p>	<p>The staff that operates the Client Database for Cordia</p>

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<p>of Smart Home systems and devices in your residential property, the forwarding of your data to contributing persons and/or companies so that they may communicate with you directly in relation to this.</p> <p>One such is Boston Technologies Kft, which installs the Smart Home system. Headquarters: 1015 Budapest, Hattyú utca 18. III/5. Company registration number: 01-09-902980.</p>	<p>GDPR Article 6, (1) b) – processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract.</p> <p>Contributing persons during the course of the development and operation of Smart Home systems and devices – such as data processors independent of Cordia – may have their own conditions (e.g. processed data categories, time limit on data storage, access rights, data security measures). These contributors should give you prior information when you contact them directly.</p>	<p>number, as well as the data subject’s address.</p> <p>Providing the data is a prerequisite to the conclusion and fulfilment of the preparation of the agreement relating to the construction and operation of the Smart Home system. The agreements relating to the Smart Home cannot be prepared without transferring contact information and taking account of the home’s specific properties, we cannot carry out the work related to obtaining, installing and putting the Smart Home system and devices into service on your behalf.</p>	<p>completion of installation and/or operation of the Smart Home system and devices, based on Ptk 6:22.</p> <p>For meeting tax obligations: the data retention period is 5 years from the last day of the calendar year in which the tax should have been declared or included in the tax return and should have been paid if the tax return was missing (Art. 78. § (3), 202. § (1)).</p> <p>If we are obligated to keep the data based on the Accounting Act, the data will be deleted 8 years following the above date. In practice, this applies where the data represents part of the supporting documentation relating to the installation and operation of the Smart Home system, for example in documents associated with the conclusion of the contract and invoicing (in the contract itself, in this case) or are included in the invoice.</p>	<p>Management and the Cordia Agent.</p>

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<p>Handling the data of contact persons of other contracted partners acting in connection with contracts not identified in this Policy (in particular, agency contracts, contracts for work, cooperation agreements – such as system support software contracts, introduction of accounting systems, participation in real estate fairs abroad), and of persons who are involved in the performance of these contracts and in monitoring performance (on a daily basis). This includes, for example, handling the postal address of contact persons, the instructions of contact persons for making payments, or sending official notices by using the contact details and information on the contractual obligations to be fulfilled.</p>	<p>Depending on whether the contract is made with the data subject (e.g. individual entrepreneur) or another enterprise: Section 6(1) (b) of the GDPR – performance of the contract made directly with the data subject / Section 6 (f) of the GDPR – the legitimate interest of Cordia and the enterprise making a contract with it: fulfilling contractual obligations, exercising rights and coordinating economic cooperation between the parties.</p> <p>Transfer of personal data is a contractual requirement: without personal data, Cordia is unable to execute and perform the contract.</p>	<p>Name and contact details (email address, phone number, mobile phone number, fax number) of contracted partners (including their contact persons, as well as of persons involved in the performance of these contracts and in monitoring performance), and any activity and communication including personal data (e.g. from the contact person or from any other natural person acting on behalf of the partner).</p> <p>The personal data will be made available to Cordia by either the contractual partner or the data subjects themselves.</p>	<p>5 years from the termination of the legal relationship (Ptk. 6:22 § (1) – unless otherwise provided by the Ptk., the claims will lapse after 5 years.)</p> <p>For meeting tax obligations: the data retention period is 5 years from the last day of the calendar year in which the tax should have been declared or included in the tax return and should have been paid if the tax return was missing (Art. 78. § (3), 202. § (1)).</p> <p>For accounting statements: the data retention period is 8 years (Accounting Act, 168-169. §).</p>	<p>Cordia’s employees acting during the execution and performance of the given contract.</p>
<p>Handling the data of contracted partners, contact persons as well as persons involved in the performance</p>	<p>Cordia’s legitimate interest (Section 6(1) (f) of the GDPR).</p>	<p>Name and contact details (email address, phone number, mobile phone number, fax number) of</p>	<p>5 years from the termination of the legal relationship (Ptk. 6:22 § (1) – unless otherwise provided by the</p>	<p>Cordia’s employees acting during the execution and performance of the given contract.</p>

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<p>of these contracts and in monitoring performance for compliance issues regarding the contracts or performing any other activity for ensuring performance of the contract, including seeking legal redress opportunities for ensuring contractual rights.</p>	<p>Legitimate interest: handling compliance issues regarding the contracts or performing any activities for ensuring performance of the contract, including seeking options for legal redress for ensuring contractual rights.</p>	<p>contracted partners (including their contact persons, as well as of persons involved in the performance of these contracts and in monitoring performance), and any activity and communication including personal data (e.g. from the contact person or from any other natural person acting on behalf of the partner).</p> <p>The personal data will be made available to Cordia by either the contractual partner or the data subjects themselves.</p>	<p>Ptk., the claims will lapse after 5 years.)</p> <p>For meeting tax obligations: the data retention period is 5 years from the last day of the calendar year in which the tax should have been declared or included in the tax return and should have been paid if the tax return was missing (Art. 78. § (3), 202. § (1)).</p> <p>For accounting statements: 8 years (Accounting Act, 168-169. §). In practice, this is a case when the data constitute part of the documents supporting bookkeeping, for example, the data are shown in documents related to contracts between the Company and its partner (e.g. in orders) or on invoices issued.</p>	
<p>Handling the data of contracted partners, contact persons as well as persons involved in the performance of these contracts and in</p>	<p>Cordia's legitimate interest (Section 6(1) (f) of the GDPR).</p> <p>Legitimate interest:</p>	<p>Name and contact details (email address, phone number, mobile phone number, fax number) of contracted partners</p>	<p>5 years from the termination of the legal relationship (Ptk. 6:22 § (1) – unless otherwise provided by the Ptk., the claims will lapse</p>	<p>Cordia's employees acting during the execution and performance of the given contract.</p>

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<p>monitoring performance for compliance issues regarding the contracts or performing any other activity for ensuring performance of the contract, including seeking legal redress opportunities for ensuring contractual rights.</p>	<p>handling compliance issues regarding the contracts or performing any activities for ensuring performance of the contract, including seeking options for legal redress for ensuring contractual rights.</p>	<p>(including their contact persons, as well as of persons involved in the performance of these contracts and in monitoring performance), and any activity and communication including personal data (e.g. from the contact person or from any other natural person acting on behalf of the partner).</p> <p>The personal data will be made available to Cordia by either the contractual partner or the data subjects themselves.</p>	<p>after 5 years.)</p> <p>For meeting tax obligations: the data retention period is 5 years from the last day of the calendar year in which the tax should have been declared or included in the tax return and should have been paid if the tax return was missing (Art. 78. § (3), 202. § (1)).</p> <p>For accounting statements: 8 years (Accounting Act, 168-169. §). In practice, this is a case when the data constitute part of the documents supporting bookkeeping, for example, the data are shown in documents related to contracts between the Company and its partner (e.g. in orders) or on invoices issued.</p>	
<p>Documenting the consents of the data subjects to data handling and the withdrawal of their consent, if any</p>	<p>Article 6(1 (c) of the GDPR (processing is necessary for compliance with a legal obligation to which Cordia as controller is subject).</p>	<p>Where processing data by Cordia is based on consent of the data subject, Cordia will document the relevant consent. The goal of this is to be able to verify the</p>	<p>Data retention period: open-ended period, unless otherwise provided by the guidance of the data protection authority.</p>	<p>The employees contributing to handling the consent and its withdrawal, as well as Cordia's representative.</p>

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	<p>Legal obligation: pursuant to Article 7(1) of the GDPR, where processing is based on consent, the controller shall be able to demonstrate that the data subject has consented to processing of his or her personal data.</p>	<p>lawfulness of the consent at any time. If the data subject withdraws his or her consent, Cordia will also retain this withdrawal (and any communication related to it). The goal of this is to ensure that Cordia will always know that a data subject has withdrawn his or her consent regarding a particular data processing action.</p>		
<p>Keeping records of privacy incidents (including the documentation of measures taken in order to manage such incidents).</p>	<p>Article 6(1 (c) of the GDPR (processing is necessary for compliance with a legal obligation to which Cordia as controller is subject).</p> <p>Legal obligation: pursuant to Article 33(5) of the GDPR, the controller shall document any personal data breaches, comprising the facts relating to the privacy incident involved, its effects and the remedial action taken. This documentation shall enable the supervisory authority to verify compliance with the requirements of the GDPR.</p>	<p>The personal data of the data subjects involved in the privacy incident.</p>	<p>Data retention period: open-ended period, unless otherwise provided by the guidance of the data protection authority.</p>	<p>The employees contributing to handling the privacy incident, as well as Cordia's representative.</p>