

## Data Handling Policy

**Cordia Management Szolgáltató Korlátolt Felelősségű Társaság**  
**Cordia Agent Hitelszervező and Ingatlanforgalmazó Korlátolt Felelősségű Társaság**  
Last modified: 30 July 2019

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#### 1. General provisions and contact details

This policy (“**Policy**”) applies to the handling of any information (personal data) concerning identified or identifiable natural persons (data subjects) by Cordia Management Szolgáltató Korlátolt Felelősségű Társaság (“**Cordia Management**”) and/or Cordia Agent Hitelszervező és Ingatlanforgalmazó Korlátolt Felelősségű Társaság (“**Cordia Agent**”).

All data handling activities below that are carried out according to this Policy independently by one of the Cordia companies will appear separately under that company’s name. Those activities carried out jointly by Cordia Management and Cordia Agent (together “**Cordia**”) will be referred to as such. Joint data handling means that Cordia Management and Cordia Agent will determine the purpose and methods of any given data handling jointly. The joint data processors will determine in the agreement created between them, how their responsibilities are divided for the purposes of fulfilling their tasks according to EU 2016/679 General Data Protection Regulation (“**GDPR**”). The key points of the agreement must be made available to the data subject.

Cordia address: 1082 Budapest, Futó utca 47-53. VII. em.

Cordia Management company registration number: Cg. 01-09-289024

Cordia Agent company registration number: Cg. 01-09-877571

Cordia webpage: <https://cordia.hu/>

Cordia phone number: +36 1 266 2181

Cordia e-mail address: [cordia.management@cordia.hu](mailto:cordia.management@cordia.hu)

Cordia representative and contact information: Földi Tibor, see contact information above

If you have any questions or remarks concerning this Policy, please contact Cordia at one of above contact details prior to using the website and prior to providing any information or data in accordance with this Policy.

If you provide Cordia with personal data through a third-party service (for example, through a social media page), you may be subject to the data handling policy and other terms of use of that given service, for which Cordia bears no responsibility.

## **2. Updates and access to the Policy**

Cordia reserves the right to unilaterally modify the Policy, following any prior modifications, after which such modification shall come into effect. Modification of this policy can especially take place if it is necessary due to legal changes, data protection authority practice, company or employee demand, new purpose of data handling, or newly discovered security risks. Cordia may use the contact details of the data subject made available to Cordia for the purpose of making and maintaining contact with the data subject in connection with this Policy or with privacy issues or otherwise. Upon your request, for example, Cordia will send you a copy of the current effective version of this Policy or certify that the Policy has been made available to the data subjects.

## **3. Other data protection conditions**

During use of the individual separate services, you may be subject to specific data protection conditions that you will be informed of prior to using the given service.

The data subjects must make available to Cordia the relevant personal data pursuant to applicable regulations in every case. In particular, they must have appropriate and informed consent or other legal basis for transferring personal data (such as transferring the data of contact persons, relatives). If Cordia learns that any of the data of a data subject has been transferred without their consent or without other legitimate legal basis, Cordia may immediately delete such data; in addition, the data subject will be entitled to exercise their rights and options for legal redress under this Policy. Cordia shall not be responsible for any damage, loss or injury arising from breach of the above obligations or statements by the data subject.

## **4. The scope of handled data and the purpose of data handling**

The scope of personal data processed by Cordia Management and/or Cordia Agent, the purposes of data handling, the duration of the data handling and those authorised to access the data is presented in detail in the table below.

The data management objectives are summarised as follows:

- Preparation of a real estate sales contract between the clients of Cordia Management and the sellers of the properties they wish to purchase, in particular, providing information about the real estates you are seeking. Cordia Management will forward the contact details of buyers (name, address, email, phone number) to the presidents of the condominium boards concerned for the sales contract.
- Forwarding data to Cordia FM Társasházkezelő Korlátolt Felelősségű Társaság. Property management services, as well as use of related real estate leasing, real estate brokerage and other services.
- Online account creation on a Cordia website.
- Sending of advertising materials via e-mail and/or with telephone inquiries (direct business acquisition) by Cordia.
- Conducting a satisfaction survey after buying a flat or using Cordia's services, for example in words, writing, via email or phone.
- Sending buyer information by Cordia.
- Preparation of loan and bank account contracts related to the real estate sales contract by OTP Bank Nyrt.
- Installation and operation of Smart Home systems and tools for the automisation of your home.
- Handling the data of contact persons of contracted partners acting in connection with contracts not identified in this Policy and of persons who are involved in the performance of these contracts and in monitoring performance (on a daily basis).

- Handling the data of contracted partners, contact persons as well as persons involved in the performance of these contracts and in monitoring performance for compliance issues regarding the contracts or for any other purpose, including seeking options for legal redress for ensuring contractual rights.
- Data handling in connection with the enforcement of the data protection rights of the data subjects (for details, see Section 9).
- Archiving the consents of the data subjects to data handling and the withdrawal of their consent, if any.
- Keeping records of privacy incidents (including the documentation of measures made in order to manage such incidents).

If a data handling objective is necessary for the validation of legitimate interests of Cordia or a third party, Cordia will make available the weighing test used in determining legitimate interest if a request has been made through any of the above contacts.

**Cordia particularly calls the attention to all involved parties that those involved have the right to object, at any time and for reasons connected to their personal situation, to the legitimate interest-based handling of their personal data, including profiling based on the provisions mentioned. In this case, Cordia will cease handling personal data unless it proves that the data handling is justified by such compelling reasons which give it priority over the interests, rights and freedoms of the involved party, or which are connected to the submission, enforcement or protection of legal claims. If the handling of personal data occurs for direct business acquisition purposes, the involved party has a right to object at any time to the handling of their personal data for this purpose, including profiling, if it is connected to direct business acquisition. 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 (forty-eight) hours. The deadline to unsubscribe begins upon confirmation. If you do not confirm the unsubscribe request within 48 hours, the link will expire and a new one must be requested.**

**The legal basis and the period of each data handling actions are essentially defines by the following rules of law:**

- **“Art.”** – Act CL of 2017 on the rules of taxation. Cordia FM is obliged to keep the data supported by taxation certificates.
- **“Ptk.”** – Act V of 2013 on the Civil Code. If the duration of data handling is indicated as the expiry date of the obligation to provide information, the activity that interrupts the expiry extends the duration of data handling until the new date (Ptk. § 6:25 (2)). In the event that expiry is extended, the request can be presented within the one-year – or three-month if the period of expiry is shorter –deadline from the lifting of the restriction even if the period of expiry has already passed, or if less time remains than the above period. (Ptk. § 6:24 (2)).
- **“Advertising Act”** – *Act XLVIII of 2008* on Essential Conditions of and Certain Limitations to Business Advertising.
- **“Accounting Act”** – Act C of 2000 on accounting. Cordia FM is required to retain certain data – such as those that are contained in the documents (e.g. a sales contract) that support accounting, or that are included in the contract between Cordia FM and the client or on invoices issued – in accordance with the Accounting Act. The retention period of 8 years set forth in the Act from the date on which there was a piece of data in the given year that should be treated as an accounting item, or when the report/general ledger was

based on the given data. In practice: if an item is included in a contract on the basis of which several different services are performed (e.g. several services are provided under the same contract), the 8-year period should be calculated separately for each service performed, because separate invoices are made out for each service, and the deals are recorded in the books accordingly. If the piece of data, for example, is included in a contract for the sale of something (the item has been delivered and the contract is terminated), the deal is entered into the books on the basis of the contract and the invoice, and the 8-year period mentioned above will commence from there.

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><b>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.</b></p> <p>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 (“<b>Client Database</b>”).</p> <p>In connection with the fulfillment 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</p>	<p>Act V of 2013 on the Civil Code (“<b>Ptk.</b>”) § 6:288. [Intermediation Contract] 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 <a href="https://cordia.hu">https://cordia.hu</a> 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</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 <b>Accounting Act</b>, 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>condominium. The purpose of 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>of your subscription to its newsletter so that it can know whether to send you one.</p> <p>This data serves as the prerequisite for the preparation, conclusion, and fulfilment of the contract.</p> <p>The priority of properties offered will be established based on the data provided.</p> <p>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><b>Data transfer to Cordia FM Társasházkezelő Korlátolt Felelősségű Társaság (“Cordia FM”)</b></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 handling activities.</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: <a href="http://www.cordia.hu">www.cordia.hu</a></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 (“<b>Accounting Act</b>”), the data will be deleted after 8 years following the termination of the relationship. In practice, such cases are where the data is</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><b>Those with data access within Cordia FM:</b> The Cordia FM manager, as well as persons overseeing tasks related to property leasing, brokering and other activities.</p>

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			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><b>Opening an online account on one of Cordia's websites.</b>  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 <a href="https://cordia.hu">https://cordia.hu</a> 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 you wish to purchase” according to the goal of the</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 confirmation. If you do not confirm you intention to</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>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>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><b>Sending marketing materials via e-mail and/or telephone (direct marketing) from Cordia; based on apartment-seeking preferences in the case of personalised advertising.</b> Direct contact with clients interested in the purchase or</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, specific and explicit consent of the data subject.</p>	<p>Your name, e-mail address and telephone number. This data is recorded in the Client Database.</p> <p>Information relating to the operation of the Client Database can be found in the first row of this table.</p>	<p><b>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</b></p>	<p>The staff operating the Cordia Management and Cordia Agent Client Database during the course of sending marketing materials, as well as the staff of Cordia Agent operating the Client Database with regard to</p>

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<p>rental of properties, and other services related to properties found on – among others the <a href="https://cordia.hu/">https://cordia.hu/</a> website – for the purposes of providing information on services via telephone or e-mail (newsletter).</p> <p><b>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.</b></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>When information is provided on the registration page of the <a href="https://cordia.hu/">https://cordia.hu/</a> 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 residence as given by the client (for example, number of rooms).</p>	<p><b>Policy.</b>  <b>Withdrawing your consent does not affect the legality of any consent-based data handling that took place prior to your withdrawal of consent.</b></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 link will expire and a new one must be requested.</p>	<p>sending of loan information.</p>

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		<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:  <a href="https://cordia.hu/">https://cordia.hu/</a> (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>		
<p><b>Satisfaction survey following home purchase and use of Cordia services, in person, in writing, through e-mail or telephone.</b></p> <p>The goal of the above data management is to survey 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</p>	<p>GDPR article 6, point 1 a) – your consent.</p>	<p>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 like to get to have your data which could be relevant to choosing properties and services. For example, social status, monthly</p>	<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 any consent-based data handling that took place prior to your withdrawal of consent.</p>	<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.</p>

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estate market.		income, reading habits, and satisfaction with Cordia services and received materials.	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.	
<b>Customer information sent by e-mail from Cordia.</b> Informing customers (with signed registration agreements, real estate purchase agreements, and in possession of a sales contract) who have purchased properties (found at <a href="https://cordia.hu/">https://cordia.hu/</a> ) sold by salespeople connected to the Cordia group, regarding the progress of Cordia project(s) and other important milestones affecting their property.	GDPR article 6, (1) f) – legitimate interests of Cordia. Legitimate interest: priorly (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.	Your name (first and last), data of your property and data of the related Cordia project, and your e-mail address.	Until the completion of the given project.  <b>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.</b>	The Cordia Management staff that work to send the customer information.
<b>Preparation of the loan and credit agreement by OTP Bank Nyrt. (“OTP Bank”) related to the purchase contract between you, as a client of Cordia Management, and the sellers of the property you wish to purchase.</b> A mobile	Ptk. § 6:382 - § 6.415 <i>[Loan and credit agreements]</i>  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	Your name (first and last), e-mail address and telephone number, and data 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	Personal data, as indicated in Act LIII of 2017 on prevention and combating of 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 staff that operate the Client Database for Cordia Management and the Cordia Agent connected to data transfer for OTP Bank, as well as the sellers of the property.  OTP Bank’s mobile agents

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<p>agent of OTP Bank (headquarters: 1051 Budapest, Nádor u. 16. website and contact info: <a href="http://www.otpbank.hu">www.otpbank.hu</a> and <a href="mailto:informacio@otpbank.hu">informacio@otpbank.hu</a>) 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>request of the data subject prior to entering into a contract.</p>	<p>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>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>in relation to sending of loan information and other information.</p>
<p><b>In the interests of development and operation 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</b></p>	<p>Ptk. Chapter XXXVII [<i>The business contract</i>]</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</p>	<p>Name, address, e-mail address and telephone 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</p>	<p>Data will be deleted after 5 years following the 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</p>	<p>The staff that operates the Client Database for Cordia Management and the Cordia Agent.</p>

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<p><b>communicate with you directly in relation to this.</b></p> <p>One such is <b>Boston Technologies Kft</b>, which installs the Smart Home system.  Headquarters: 1015 Budapest, Hattyú utca 18. III/5.  Company registration number: 01-09-902980.</p>	<p>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>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>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 <b>Accounting Act</b>, 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>	

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><b>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).</b> 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><b>Handling the data of contracted partners, contact persons as well as persons</b></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</p>	<p>5 years from the termination of the legal relationship (Ptk. 6:22 § (1) – unless</p>	<p>Cordia’s employees acting during the execution and performance of the given</p>

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><b>involved in the performance 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.</b></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>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>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><b>For accounting statements: 8 years</b> (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>contract.</p>
<p><b>Handling the data of contracted partners, contact persons as well as persons involved in the performance of these contracts and in</b></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>

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><b>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.</b></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><b>For accounting statements: 8 years</b> (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><b>Documenting the consents of the data subjects to data handling and the withdrawal of their consent, if any</b></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><b>Legal obligation:</b> pursuant</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 lawfulness of the consent at</p>	<p><b>Data retention period:</b> 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>

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?
	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.	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><b>Keeping records of privacy incidents (including the documentation of measures taken in order to manage such incidents).</b></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><b>Legal obligation:</b> 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>	The personal data of the data subjects involved in the privacy incident.	<b>Data retention period:</b> open-ended period, unless otherwise provided by the guidance of the data protection authority.	The employees contributing to handling the privacy incident, as well as Cordia's representative.

## 5. **Transfer of personal data to our contracted partners**

In addition to the contracted partners separately named in this policy, Cordia uses the below contracted partners for the completion of tasks related to data handling activities.

The contracted partners are summarised as follows:

- salesforce.com EMEA Limited – storage services
  - Attention CRM Consulting Kft. – website development and management.
  - LEAD GENERATION Kft. – customer service.
  - DONE Digital Kft. – website development.
  - Silver Frog Informatikai Kereskedelmi és Szolgáltató Kft. – storage services.
  - Hidden Design Kft. - storage services.
  - Wavemaker Hungary Média, Tartalom és Technológia Kft. - media planning and media purchasing tasks.
- Cordia vendors – preparation of sales contracts.

The contracted partner acts as a so-called 'data processor': it handles the personal data outlined in this policy on behalf of Cordia. Cordia may only use such data processors which provide adequate guarantees, in particular concerning expertise, reliability and resources, regarding the implementation of technical and organisational measures to ensure compliance with GDPR requirements, including data handling security. The specific tasks and responsibilities of the data processor are specified by the contract between the data processor and Cordia. Following the handling of data on behalf of Cordia, the data processor will return or delete the personal data at Cordia's decision, unless EU law or that of a member state applicable to the data processor prescribes its storage.

Contracting partner	What data do they have access to? What tasks do they complete?	How long do they store the data?
<p><b>salesforce.com EMEA Limited</b></p> <p>Floor 26 Salesforce Tower, 110 Bishopsgate, EC2N 4AY London, United Kingdom +44 1784607000 <a href="https://www.salesforce.com/eu/company/locations/">https://www.salesforce.com/eu/company/locations/</a></p>	<p>Provides storage space for the Client Database. Along these lines, as listed in point 4, they store the personal data stored in the Client Database. Concerning personal data stored in the Client Database, the company provides IT support to Cordia for compilation and sending of personalised marketing materials (newsletters), for exploring the range of potential stakeholders interested in properties and projects, and for supplying information on properties and projects.</p>	<p>Fixed term until the contract is terminated.</p>
<p><b>Attention CRM Consulting Kft.</b></p> <p>1075 Budapest, Madách I. út 13-14. T. ép. 4. em. 30/343 9079 <a href="mailto:attentioncrm@attentioncrm.hu">attentioncrm@attentioncrm.hu</a> <a href="http://www.attentioncrm.hu/">http://www.attentioncrm.hu/</a></p>	<p>Supports technical tasks related to the development and maintenance of the Client Database. Along these lines, as listed in point 4, they have access to personal data stored in the Client Database for the purposes of the developments completed in the Client Database and strict testing of the operation of the Client Database. Additionally, it manages the database which stores information about price bids and newsletter subscriptions.</p>	<p>Indefinite services framework agreement – until contract is terminated.</p>
<p><b>LEAD GENERATION Kft.</b></p> <p>1036 Budapest, Lajos utca 66. 70/609-8400 <a href="mailto:info@leadgeneration.hu">info@leadgeneration.hu</a> <a href="http://www.leadgeneration.hu/">http://www.leadgeneration.hu/</a></p>	<p>Placing phone calls to customers interested in properties available for sale or rent and in other services found on <a href="https://cordia.hu">https://cordia.hu</a>, as well as <u>introducing customers to the property and services</u>. The personal data of users for the purposes of data handling “<i>Advertising materials sent by Cordia via e-mail and/or telephone</i>” as laid out in point 4.</p>	<p>Indefinite purchase order framework agreement – until contract is terminated.</p>

Contracting partner	What data do they have access to? What tasks do they complete?	How long do they store the data?
<p><b>DONE Digital Kft.</b></p> <p>1095 Budapest, Gát utca 21. fszt. 1. 30/2008218 <a href="mailto:hello@thisisdone.com">hello@thisisdone.com</a> <a href="https://thisisdone.com/">https://thisisdone.com/</a></p>	<p>Cordia website development. Technically has access to personal data as necessary for development (Client Database, data handled through online accounts, data handled through registering for newsletter), beyond which they do not carry out any further activities with regards to the data.</p>	<p>Indefinite enterprise and user framework agreement – until contract is terminated.</p>
<p><b>Silver Frog Informatikai Kereskedelmi és Szolgáltató Korlátolt Felelősségű Társaság</b></p> <p>1133 Budapest, Pannónia u 102. 20/4224432 <a href="mailto:info@silverfrog.hu">info@silverfrog.hu</a> <a href="http://www.silverfrog.hu">www.silverfrog.hu</a></p>	<p>Storage services, which technically has access to personal data as necessary for the services (Client Database, data handled through online accounts, data handled through registering for newsletter), beyond which they do not carry out any further activities with regards to the data.</p>	<p>Indefinite services framework agreement – until contract is terminated.</p>
<p><b>Hidden Design Korlátolt Felelősségű Társaság</b></p> <p>1095 Budapest, Gát utca 21. fszt. 1. Mailing address: 1094 Budapest, Tűzoltó utca 66. földszint 4. <a href="mailto:hidden@hidden.hu">hidden@hidden.hu</a> +36-20-426-1580 <a href="https://www.hidden.hu/">https://www.hidden.hu/</a></p>	<p>Storage services (database storage), which technically has access to personal data as necessary for the services (Client Database, data handled through online accounts, data handled through registering for newsletter), beyond which they do not carry out any further activities with regards to the data.</p>	<p>Indefinite services framework agreement – until contract is terminated.</p>
<p><b>Wavemaker Hungary Média, Tartalom és Technológia Korlátolt Felelősségű Társaság</b></p> <p>1123 Budapest, Alkotás út 53. B. ép. III.em Mailing address: 1123 Budapest, Alkotás út 53. B. ép. III.em +36-30-407-8733 <a href="mailto:info.budapest@mecglobal.com">info.budapest@mecglobal.com</a></p>	<p>Media planning and media purchasing activities, which technically has access to personal data as necessary for the services (Website Database, data handled through online accounts, data handled through registering for newsletter), beyond which they do not carry out any further activities with regards to the data.</p>	<p>Indefinite services framework agreement – until contract is terminated.</p>

Contracting partner	What data do they have access to? What tasks do they complete?	How long do they store the data?
<p><b>Cordia sales team</b></p> <p>During the „sales management” services, some of the Cordia sales team can act as data processors. A comprehensive list of sales team members can be found in Cordia's contact details.</p>	<p>Personal data designated for data handling purposes from the “real estate purchase contract between you, a client of Cordia Management, and the owners of the properties you would like to purchase.”</p>	<p>Indefinite services framework agreement – until contract is terminated.</p>

Cordia Agent will provide financial intermediation service to OTP Pénzügyi Pont Zrt acting as a dependent sub-agent by intermediating the products and services of the OPT Group as set forth in the dependent sub-agency contract to customers that it has dealings with in its business activities. In this context, Cordia acts as data processor, and for the purpose of data processing, the Privacy Notice of OTP Pénzügyi Pont Zrt as data controller shall prevail.

## 6. Cookies used on the <https://cordia.hu> website

Cookies are used in certain areas of the <https://cordia.hu> website. The cookies are files that store information on your hard disk or web browser.

Cookies, for example, make it possible for the website to recognise if you have visited previously, or, by allowing us to see which sites you visit and how much time you spend there, help us understand what part of the website is most popular. By studying this, we can better adjust the site to your needs and offer a more varied user experience. With the help of cookies, we can assure that the information displayed on your next visit to the site will meet your expectations (without identifying you personally).

When you visit one of our websites, technical information may be gathered that does not allow you to be personally identified. For example, the name of another website that directed you here, the location from where you accessed the website, and search queries completed on the website. Collecting this information helps us identify the preferred search habits of our website users without using their personal data. Such information is used strictly for internal purposes. Anonymous or general data from which your person cannot be identified does not qualify as personal data and thus does not fall within the scope of this Policy.

You can change the web configuration to either accept cookies, delete all cookies, or receive notification when cookies appear on your machine. Since all web applications are different, we ask that you use the 'Help' menu on your browser to adjust your cookie settings. You can find further information on cookies and disabling them at a <http://www.youronlinechoices.com/hu/>. The <https://cordia.hu> website was intended to operate with the use of cookies, so disabling them may affect on the functionality of the website, or prevent you from taking advantage of all its benefits.

Links for the handling of cookies in the case of most frequently used browsers:

Mozilla Firefox: <https://support.mozilla.org/t5/Cookies-and-cache/Enable-and-disable-cookies-that-websites-use-to-track-your/ta-p/2784>

Google Chrome:

<https://support.google.com/chrome/answer/95647?co=GENIE.Platform%3DDesktop&hl=en>

Internet Explorer: <https://support.microsoft.com/en-us/help/17442/windows-internet-explorer-delete-manage-cookies>

Google Analytics provides a further option of unsubscribing from the Google Analytics service: <http://tools.google.com/dlpage/gaoptout?hl=en-GB>

Cookies used on the <https://cordia.hu/> website:

Cookie name	Cookie type	Why is it necessary for the webpage and what is its function with respect to the user?  What data does it have access to?	Lifetime
sess	Cookie used by Cordia's service providers (third-party cookie)	The purpose of the cookie is to test if the browser accepts cookies.	For the duration of the user's visit to the website (session). Cookies set up for this purpose are

Cookie name	Cookie type	Why is it necessary for the webpage and what is its function with respect to the user?  What data does it have access to?	Lifetime
	Domain: .adnxs.com (AppNexus)		automatically deleted upon closing the website.
<b>anj</b>	Cookie used by Cordia's service providers (third-party cookie)  Domain: .adnxs.com (AppNexus)	The cookie identifies the device of the returning user. We use it to display identified targeted advertising.	3 months
<b>uuid2</b>	Cookie used by Cordia's service providers (third-party cookie)  Domain: .adnxs.com (AppNexus)	The cookie can recognise browser and device type, users' interests and the history of advertisements displayed on the device or browser. This information is used for the selection and delivery of advertisements, as well for measuring the performance of the advertisements. Further information: <a href="https://www.appnexus.com/en/company/platform-privacy-policy">https://www.appnexus.com/en/company/platform-privacy-policy</a>	3 months
<b>icu</b>	Cookie used by Cordia's service providers (third-party cookie)  Domain: .adnxs.com (AppNexus)	This cookie manages the number of times a user sees a given advertisement. The cookie contains such information as, for example, how many times advertisements were displayed, how the advertisement was displayed in the recent past, and how many times all advertisements have been displayed.  <i>Pixel tracker</i> – also known as <i>clear GIF</i> or <i>web beacon</i> , is an unseen mark on a website (but not on the device). If a user visits the webpage, the pixel sends a broad general notification of the visit. These usually work together with cookies – recording whether a webpage was visited through a particular device.	No longer than 90 days
<b>_ga</b>	Cookie used by Cordia (own cookie)	The cookie relates to Google Universal Analytics. It distinguishes between individual users and generates statistical data on how the user accesses the website.	2 years

Cookie name	Cookie type	Why is it necessary for the webpage and what is its function with respect to the user?  What data does it have access to?	Lifetime
	Domain: .cordia.hu		
<b>_gat_UA-#</b>	Cookie used by Cordia (own cookie)  Domain: .cordia.hu	In order to allow the measurement and optimisation of the performance of the website with the help of Google Analytics, this cookie makes it possible to count the number of visitors to the website and traffic sources.	1 minute
<b>_gfp_64b</b>	Cookie used by Cordia (own cookie)  Domains: .cordia.hu / .gemous.pl	This cookie handles other cookies accepted by the user. The purpose of this is to track user activity across multiple websites. In practice this is done by storing the user's search history to increase the effectiveness of marketing tools and, maintaining anonymity, prepare reports on this in comparison with the Webpage Database. For example, Cordia can access which website a user left before accessing <a href="https://cordia.hu/">https://cordia.hu/</a> and began or finished requesting an offer. Cordia can thus conclude the effectiveness of their marketing tools (for example, an advertisement that can be clicked to bring a user onto the Cordia website) by determining, for example, how many times an advertisement must appear on the original website to make the user more likely to ask for an actual offer from Cordia.	3 years
<b>_gid</b>	Cookie used by Cordia (own cookie)  Domain: .cordia.hu	This cookie distinguishes/recognises users and generates statistical data on how users access the website.	24 hours
<b>_dc_gtm_UA-#</b>	Cookie used by Cordia (own cookie)  Domain: .cordia.hu	This cookie makes it possible to track website activity and analysis. It helps in identifying the age, gender and interests of users.	For the duration of the user's visit to the website (session). Cookies set up for this purpose are automatically deleted upon closing the website.

Cookie name	Cookie type	Why is it necessary for the webpage and what is its function with respect to the user?  What data does it have access to?	Lifetime
<b>IDE</b>	Cookie used by Cordia's service providers (third-party cookie)  Domain: .doubleclick.net	The purpose of this cookie is to measure the effectiveness of advertisements and to generate targeted advertisements for users. Through the use of Google DoubleClick, it records the user's activity on the website after the user has viewed an advertisement.	2 years
<b>DSID</b>	Cookie used by Cordia's service providers (third-party cookie)  Domain: .doubleclick.net	The purpose of this cookie is to measure the effectiveness of advertisements and to show targeted advertisements to certain users. The cookie is used by Google to record user activity after the user has clicked the advertiser's ad.	15 days
<b>Gdyn</b>	Cookie used by Cordia's service providers (third-party cookie)  Domain: .hit.gemius.pl	This cookie is set up when the user blocks participation in the GemiusAudience survey. (via various research surveys and advertising networks).	4 years
<b>id</b>	Cookie used by Cordia's service providers (third-party cookie)  Domain: .mookie1.com	This cookie registers a unique identifier that identifies the returning user's device. The identifier is used for the display of targeted advertisements.	1 year
<b>mdata</b>	Cookie used by Cordia's service providers (third-party cookie)	This cookie registers a unique identifier that identifies the returning user's device. The identifier is used to display targeted advertisements.	1 year

Cookie name	Cookie type	Why is it necessary for the webpage and what is its function with respect to the user?  What data does it have access to?	Lifetime
	Domain: .mookie1.com		
<b>OAX</b>	Cookie used by Cordia's service providers (third-party cookie)  Domain: .mookie1.com	This cookie regulates the frequency of targeted advertisements and helps display relevant advertisements.	1 year
<b>_hjIncludedInSample</b>	Cookie used by Cordia (own cookie)  Domain: .cordia.hu	The purpose of this cookie is analysis: it individually identifies the user, and indicates what audience set they belong to.	For the duration of the user's visit to the website (session). Cookies set up for this purpose are automatically deleted upon closing the website.
<b>_icl_current_language</b>	Cookie used by Cordia (own cookie)  Domain: .cordia.hu	This cookie stores the user's language preferences.	24 hours
<b>.cookie_law</b>	Cookie used by Cordia (own cookie)  Domain: .cordia.hu	This cookie records the user's cookie settings.	60 years
<b>wp-settings-</b>	Cookie used by Cordia (own cookie)	This cookie serves to personalise the appearance of the administration interface. (Only for administrators.) The admin interface is a separate area within the website, where the building, configuration, editing, display and	1 year

Cookie name	Cookie type	Why is it necessary for the webpage and what is its function with respect to the user?  What data does it have access to?	Lifetime
	Domain: .cordia.hu	other typical configuration, processing and publication of the final contents of the website takes place. Only users with the relevant authorisation have access to the admin interface.  So-called 'secure cookie'	
<b>wp-settings-time-</b>	Cookie used by Cordia (own cookie)  Domain: .cordia.hu	This cookie serves to personalise the appearance of the administration interface. (Only for administrators.) The admin interface is a separate area within the website, where the building, configuration, editing, display and other typical configuration, processing and publication of the final contents of the website takes place. Only users with the relevant authorisation have access to the admin interface.  So-called 'secure cookie'	1 year
<b>PHPSESSID</b>	Cookie used by Cordia (own cookie)  Domain: .cordia.hu	The purpose of this cookie is to track the user's activities on the website.	For the duration of the user's visit to the website (session). Cookies set up for this purpose are automatically deleted upon closing the website.
<b>SESS</b>	Cookie used by Cordia (own cookie)  Domain: .cordia.hu	The purpose of this cookie is to record users browsing behaviour on various websites, and log the information they provided.	For the duration of the user's visit to the website (session). Cookies set up for this purpose are automatically deleted upon

Cookie name	Cookie type	Why is it necessary for the webpage and what is its function with respect to the user?  What data does it have access to?	Lifetime
			closing the website.
__utma	Cookie used by Cordia's service providers (third-party cookie)  Domain: .cordia.hu	This cookie keeps track of when the user visited the website – when they visited first and when they visited last.	Constant
__utmb	Cookie used by Cordia's service providers (third-party cookie)  Domain: .cordia.hu	This cookie records the time when the user visited a website.	For the duration of the user's visit to the website (session). Cookies set up for this purpose are automatically deleted upon closing the website.
__utmc	Cookie used by Cordia's service providers (third-party cookie)  Domain: .cordia.hu	The cookie records the time when the user left the website.	30 minutes
__utmz	Cookie used by Cordia's service providers (third-party cookie)  Domain: .cordia.hu	The cookie records where the user arrived at the website from, what search engine they used, what link they clicked on, what keywords they used and where they were located at the time they accessed the website.	6 months

## **7. Personal data relating to children and third parties**

With the exception of when parental consent is provided, persons under 16 years of age are not permitted to provide any personal data.

By providing personal data, you declare and affirm that you have considered the above and that your legal capacity related to providing personal data is not limited.

If you do not have the right to independently provide personal data, you must acquire the permission of the appropriate third party (i.e. legal representative, guardian, other persons you are representing), or provide another form of a legal basis to do so. In relation to this, you must be able to consider whether the personal data to be provided requires the consent of a third party. To this point, you are responsible for meeting all the necessary requirements, as Cordia may not otherwise come into contact with the data subject and Cordia shall not be liable or bear any responsibility in this regard. Nevertheless, Cordia has the right to check and verify whether the proper legal basis has been provided with relation to the handling of data at all times. For example, if you are representing a third party, we reserve the right to request the proper authorisation and/or consent of the party being represented with relation to the matter at hand.

We will do everything in our power to remove all unauthorised information provided and ensure that such information is not forwarded to any third party, or used for our own purposes (advertising or any other activity). We request that you inform us immediately should you become aware that a child or any other third party has provided any personal data of yours that you have not properly authorised them to do so.

## **8. Data security**

Data processed by Cordia is protected by the restrictions applied to the access of information. For example, only those who require it, in the interests of and for the purposes listed previously, have access to the data.

## **9. Your data protection rights and legal options for remediation**

Your data protection rights and legal options for remediation are detailed in the relevant provisions of the GDPR (particularly in GDPR articles 15, 16, 17, 18, 19, 20, 21, 22, 77, 78, 79, 80 and 82). The following summary contains the most important provisions, as well as information provided accordingly by Cordia, on your rights and legal options for remediation regarding data handling.

Please note that with respect to profiling (sending of promotional materials and handling of related apartment-seeking preferences) described above in this Policy, you are entitled to request personal intervention from Cordia, and to express your position in written form and make it known to Cordia. You may also object to the decision which follows the results of the profiling. In such a case, Cordia will investigate the decision with personal intervention and in consideration of the information you have provided, and will inform you of the outcome.

The information must be provided in writing or in other forms – including electronically in some cases. Verbal information may also be provided upon request, provided that you have otherwise confirmed your identity.

Electronic identity confirmation will occur through a confirmation link that will be sent to the e-mail address you've provided, which you must click to confirm your information request. Confirmation is important because Cordia must be sure that the person requesting the information 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 (forty-eight) hours. The deadline for receiving the information begins upon confirmation. If you do not confirm the information request within 48 hours, the link will expire and a new one must be requested.

Cordia will inform you of any measures taken in response to your request without undue delay, but in any case within one month of the arrival of your application for legal remediation (see GDPR articles 15-22). If necessary, taking into account the complexity and number of applications, this deadline can be extended by two additional months. Cordia will inform you within one month of receiving the request of the extension of this deadline by indicating the reasons for the delay. If you submitted your request electronically, you must be informed electronically whenever possible unless otherwise requested.

If Cordia takes no action following your request, you will be informed of the reasons for the failure to act without delay and at most within one month of receipt of your request. You will also be informed that you may submit a complaint with a supervisory authority and exercise your right to judicial redress.

## **9.1 Access rights**

- (1) You are entitled to receive a notification from us to indicate that the handling of your personal data is in progress. If data processing is in progress, you are entitled to be provided with access to your personal data and the following information:
  - a) purpose of the data handling;
  - b) categories of the data subject's personal data;
  - c) recipients or categories of recipients, who have been or will be informed of personal data, particularly third party national recipients and international organisations;
  - d) where appropriate, the planned period of personal data storage, or if it is not possible to provide this, the criteria for determining such a timeframe;
  - e) it is your right to request an update, deletion or processing restriction of personal data related to you, as well as to object to such personal data handling;
  - f) the right to lodge a complaint to the supervisory authority; and
  - g) if the data was not provided by you, all available information as to the source of such data;
  - h) automated decisions, including profiling, and at least in these cases, the applied logic and related information, the degree of relevance and expected consequences that these types of data handlings have for you.
- (2) If personal data is transferred to a third country, you are entitled to receive notification of such associated applicable guarantees.
- (3) A copy of the personal data subject to the data handling shall be made available to you. If your request was made electronically, the information shall be made available in the most commonly used electronic format, unless requested otherwise.

## **9.2 Right to update**

You are entitled to have your information updated without delay or reason at your request. You are entitled to request that any missing or incomplete personal data is updated by making, *inter alia*, a supplementary declaration.

## **9.3 Right to deletion ('right to be forgotten')**

- (1) You are entitled to have your information deleted without delay or reason, at your request, if any of the following conditions are met:

- a) there is no longer a need for the personal data for the purposes it was gathered for or handled otherwise;
- b) you revoke your consent on which the handling is based and there is no other legal basis for the data handling;
- c) you object to the data handling, and in the given case there is no overriding legitimate reason for the data handling;
- d) the personal data was processed unlawfully;
- e) the personal data must be deleted in order to fulfil our obligations under European Union or Member State law; or
- f) the collection of personal data was associated with the offering of information society services.

You will find technical regulations related to the deletion of your account in the attached purposes for data handling.

- (2) If Cordia disclosed any personal data and is obligated to delete such data based on paragraph (1), Cordia shall, with consideration to available technology and costs associated with carrying them out, take the necessary and expected steps – including technical measures – in the interest of informing those handling the data that the data subject has requested the deletion of links to the personal data in question or copies thereof, as well as further duplication of such personal data.
- (3) Paragraphs (1) and (2) are not applicable in so much as the data handling is necessary, among others:
  - a) for the purposes of exercising the right to freedom of expression and information;
  - b) for the purposes of fulfilling our obligations relating to personal data handling under European Union or Member State law, as defined therein;
  - c) for the purposes of archiving in the public interest, scientific and historical research or statistical purposes, in so much as the rights contained in paragraph (1) would seriously threaten such data handling or most likely make it impossible; or
  - d) for the submission, validation and protection of legal proceedings.

#### **9.4 Right to restrict data handling**

- (1) You are entitled to request that we restrict data handling if any of the following conditions are met:
  - a) you dispute the accuracy of the personal data, in which case the restriction is applied for the timeframe that allows for the inspection of the personal data's accuracy;
  - b) the data handling is unlawful and you object to the deletion of the data, and instead request its restricted use;
  - c) we have no further use for the data for the purposes of data handling, but you request them for the submission, validation and defence of your legal claims; or
  - d) You objected to the data handling; in which case, the restriction applies to the time period required to determine whether Cordia's legitimate reasons take precedence over those of the data subject.
- (2) If data handling is subject to a restriction based on paragraph (1), such personal data, with the exception of storage, can only be processed with your consent, or for the submission, validation and defence of your legal claims, or in the interests of protecting the rights of other natural or legal persons, or in the important public interest of the European Union or a Member State.
- (3) We shall inform you prior to the lifting of the data handling restriction.

#### **9.5 Notification obligation related to the updating, deleting and data handling restriction of personal data**

Cordia shall communicate any updates, deletion or data handling restriction to those recipients to whom the data have been disclosed, unless this proves to be impossible or requires excessive resources. We shall inform you of the recipients upon your request.

## **9.6 Right to data portability**

- (1) You are entitled to receive personal data applicable to you and made available to us, in an articulate, commonly used, machine-readable format, furthermore, you are entitled to forward these data to another data processor without obstruction from Cordia, if:
  - a) data handling is based on consent or a contractual agreement; and
  - b) data handling takes place through automated means.
- (2) In exercising the right of data portability according to paragraph (1), you are entitled to – if technically possible – request the direct transmission of personal data between data controllers.

## **9.7 Right to object**

- (1) **You have the right to object, on grounds relating to your own situation, to the handling of personal data based on a legitimate interest, including profiling. In such a case, we shall not further process your personal data, unless we demonstrate compelling legitimate grounds for handling that takes precedence over your interests, rights and freedoms or relates to the submission, validation and defence of legal claims.**
- (2) **If the personal data is processed for the purposes of direct marketing, you have the right to object, at any time, to the handling of personal data relating to you in the interest of such, which also includes profiling in so much as it relates to direct marketing. 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 (forty-eight) hours. Unsubscription becomes valid upon confirmation. If you do not confirm the unsubscribe request within 48 hours, the link will expire and a new one must be requested.**
- (3) If you object to the handling of personal data for the purposes of direct marketing, the personal data can no longer be processed for this purpose.
- (4) You may also exercise your right to object through automated means, based on technical specifications, relating to the use of information society services and notwithstanding Directive 2002/58/EC of the European Parliament.
- (5) If the handling of personal data is for the purpose of scientific or historical research or for statistical purposes, you have the right to object, on grounds relating to your own situation, to the handling of personal data, unless the handling of data is necessary for the performance of tasks carried out in the public interest.

## **9.8 Right to lodge a complaint to the supervisory authority**

You are entitled to lodge a complaint to a supervisory authority – particularly in your habitual residence, place of work or the Member State of the alleged infringement – if, according to your assessment, the handling of personal data related to you infringes your rights under the GDPR. The competent supervisory authority in Hungary is: National Authority on Data Protection and

Freedom of Data (<http://naih.hu/>; 1530 Budapest, Pf.: 5.; Tel.: +36 1 391 1400; fax: +36 1 391 1410; e-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)).

### **9.9 Right to an effective judicial remedy against a supervisory authority**

- (1) You are entitled to an effective judicial remedy against the supervisory authority's legally binding decision applicable to you.
- (2) You are entitled to an effective judicial remedy if the competent supervisory authority does not respond to the complaint, or does not inform you within three months on the progress or outcome of the proceedings related to the lodged complaint.
- (3) Proceedings against a supervisory authority shall be brought before the courts of the Member State where the supervisory authority is established.

### **9.10 Right to effective judicial remedy against the data controller or processor**

- (1) You are entitled to an effective judicial remedy if, according to your assessment, the handling of personal data was improperly processed as per the GDPR and, as a result, infringes your rights under the GDPR.
- (2) The proceeding must be initiated against the data controller or the data processor before the courts of the Member State where the data controller or data processor has its principal place of business. Such proceedings may be initiated before the courts of the Member State of the data subject's usual place of residence. In Hungary, such a proceeding falls under the jurisdiction of the court. The subject may initiate the proceeding before the court applicable to the place of residence or domicile as the subject chooses. You can find out more about the jurisdiction and contact details of the court at the following website: [www.birosag.hu](http://www.birosag.hu).