

# PRIVACY POLICY

*Effective: 7 November 2022*

## 1. Purpose and scope

**Millennium Irodaház Ingatlanfejlesztő Korlátolt Felelősségű Társaság** (registered office: 1095 Budapest, Lechner Ödön fasor 6.; company registration number: 01-09-967713; hereinafter: "**Data Controller**") as data controller processes the data of visitors to the website (<https://www.millennium-towers.hu/>; hereinafter: "**Website**") and guarantees the security of such data in accordance with this privacy policy (hereinafter: "**Policy**") pursuant to the General Data Protection Regulation 2016/679 of the European Union (hereinafter: "**GDPR**").

Please read this Policy carefully, and if you have any questions or requests, contact us at the following addresses or telephone number:

*Millennium Irodaház Kft.*

*Postal address: 1095 Budapest, Lechner Ödön fasor 6.*

*E-mail address: [office@caimmo.hu](mailto:office@caimmo.hu)*

*Phone number: +36 1 501 2800*

**Data Protection Officer** of the Data Controller: (Ms.) Carmen Jaques, e-mail address: [dsb@caimmo.com](mailto:dsb@caimmo.com).

In addition to the Data Controller, the personal data is also processed by **IACD Systemhaus GmbH**, the web hosting service provider, as data processor (registered office: Höherweg 270, 40231 Düsseldorf, Germany; e-mail address: [hostmaster@iacd.net](mailto:hostmaster@iacd.net); phone number: +49(0)211 779280-0) on behalf of the Data Controller.

For further information on cookies, please click on the following link: [\*].

The Data Controller may unilaterally modify this Policy at any time, and the modification will take effect when it is published.

## 2. Contact

Visitors can contact the Data Controller using any of the contact details on the Website or by filling the contact form on the Website. The Data Controller will use the personal data provided, solely for the purpose of contacting the visitor. The personal data provided may only be known to the Data Controller, the companies that belong to the Data Controller's group and, in connection with their job, to the employees who have an employment relationship with the Data Controller. Except where required by law, the visitor's personal data will not be disclosed to third parties.

**2.1. The purpose of the data processing** is to enable the Data Controller to answer visitors' questions regarding the rental of the properties operated by the Data Controller (or its company group) and to send visitors personalised offer in response to such enquiries.

**2.2. The legal basis for the processing** is the "performance of a contract" in accordance with Article 6 (1) (b) of the GDPR. The data processing is carried out at a visitor's initiative to facilitate the conclusion of a rental contract or further communication in relation to existing rental contracts.

**2.3. The scope of personal data processed** by the Data Controller: the name, e-mail address, phone number and the subject / description of the interest of the visitor. The personal data provided will be processed exclusively by the Data Controller and, in the context of his/her job, by its employees. With the exception of legal obligation, the visitor's personal data will not be disclosed to third parties.

**2.4. Duration of storage:** the Data Controller processes the visitor's personal data for 30 days after the relevant request is answered, after which the data will be deleted.

**2.5. Data transfer within the group:** the Data Controller transfers the personal data of the visitor to the following companies that belong to the group of the Data Controller: **Duna Irodaház Kft.** (registered office: 1095 Budapest, Lechner Ödön fasor 6.; company registration number: 01-09-705064), **Duna Business Hotel Kft.** (registered office: 1095 Budapest, Lechner Ödön fasor 6.; **Duna Termál Hotel Kft.** (registered office: 1095 Budapest, Lechner Ödön fasor 6.; company registration number: 01-09-705054). This data transfer is based on the "legitimate interest" of the Data Controller, as defined in Article 6(1)(f) of the GDPR, according to the following balancing of the interests of the Data Controller and the visitor:

- The purpose of the transfer is to enable the Data Controller to notify the companies identified herein if the visitor wishes to conclude a contract or wishes to visit the premises in the office building managed by these companies.
- **The transfer of data is ad hoc and conditional:** it will only take place if the visitor is interested in the premises in the Millennium Tower I office building belonging to **Duna Irodaház Kft.** or in the Millennium Tower II office building belonging to **Duna Termál Hotel Kft.** or in the Millennium Tower III office building belonging to **Duna Business Hotel Kft.**
- The Data Controller does not process the visitor's special personal data, the processing does not involve profiling, and the transfer of data does not affect the visitor's right to privacy, confidentiality or similar fundamental rights.
- The companies mentioned here belong to the same Vienna-based group, so this transfer can be considered as **administrative data sharing within the group**. The transfer is not directed to a country outside the European Union or to an international organisation.

### **3. Visitors' rights regarding the data processing:**

**3.1. Right of access:** visitors may request information from the Data Controller on the circumstances of the processing of their personal data and may obtain access to such personal data.

**3.2. Right to rectification:** visitors may request the Data Controller to correct or complete inaccurately recorded personal data.

**3.3. Right to erasure:** visitors may request the Data Controller to erase their personal data processed by the Data Controller. The Data Controller will always inform visitors if their data may not be erased for any reason.

**3.4. Right to restriction of processing:** visitors may request the restriction of processing if they contest the accuracy of their personal data, or if they have a need for personal data that would otherwise be deleted (for example, to pursue their own legal claims) or if they have objected to the processing of their data as set out below.

**3.5. Right to data portability:** visitors may request the Data Controller to electronically transfer the personal data processed by the Data Controller to another data controller if the Data Controller processes them by automated means. The Data Controller will always inform visitors if their data may not be transferred for any reason.

**3.6. Right to object:** visitors may object to the processing of their data if the Data Controller would use such data to send them advertising, contract offers or similar commercial communications.

**3.7. Right to lodge a complaint:** visitors have the right to lodge a complaint with Hungary's National Authority for Data Protection and Freedom of Information if they believe that the Data Controller

has violated any legislation on the processing of personal data (address: 1055 Budapest, Falk Miksa utca 9-11., phone: +36-1-391-1400, e-mail: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu), website: [www.naih.hu](http://www.naih.hu)).

- 3.8. Right to file a lawsuit:** visitors have the right to file a lawsuit with the court that has jurisdiction over their domicile or residence (at their choice) if they believe that the Data Controller has violated their rights in the course of the processing.

\*\*\*