



Privacy Notice

Andor60 Limited Liability Company
2024.10.29.

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1. General provisions and contact details

This information notice ("Notice") relates to the processing of any information (personal data) concerning an identified or identifiable natural person (data subject) processed by Andor 60 Limited Liability Company ("Andor60") and/or DVM Group Limited Liability Company ("DVM Group").

In the remainder of this Notice, where a data processing activity is carried out independently by Andor60 or DVM Group, it will be referred to under its own separate company name. For joint processing activities, Andor60 and DVM Group are collectively referred to as "Andor60".

Joint processing means that the purposes and means of the processing are jointly determined by Andor60 and DVM Group.

The joint controllers shall define in a transparent manner, in an agreement between them, the allocation of their responsibilities for the performance of their duties under the EU General Data Protection Regulation 2016/679 ("GDPR"). The substance of the agreement shall be made available to the data subject.

The address of Andor60/DVM Group is: 1052 Budapest, Türr István utca 8.

Andor60 company registration number: Cg. 01-09-408629

Company registration number of DVM Group: Cg. 01-09-697535

The DVM Group website: <https://andorliget.hu>

Phone number of Andor60/DVMGroup: 36/1/302 4275

The email address of Andor60 is andorliget@andorliget.hu

The representative and contact details of Andor60 is Péter Haberl, see above.

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andorliget@andorliget.hu



If you have any questions or comments about this Notice, before using <https://andorliget.hu> or submitting any information under this Notice, please contact Andor60 / DVM Group using one of the contact details above.

If you provide personal data to us using a third party service (e.g. through a social networking site), the service's own privacy notice and other terms of use may also apply to the processing of that data. Andor60 / DVM Group shall not be liable in this regard.

2. Update and availability of the Guide

Andor60 / DVM Group reserves the right to amend this Notice unilaterally, with effect from the date of the amendment, subject to the restrictions set out in applicable law and, if necessary, with prior notice to the data subjects.

In particular, this Notice may be amended if necessary due to changes in legislation, data protection authority practices, business or employee needs, new data processing purposes, newly identified security risks or feedback from data subjects. In communicating with the data subject about this Notice or data protection issues, or otherwise in contacting the data subject, Andor60 / DVM Group may use the contact details of the data subject held by Andor60 / DVM Group for contact and communication purposes. For example, upon request, Andor60 / DVM Group will send the data subject a copy of the current version of the Prospectus or confirm that the data subject has read the Prospectus.

3. Other data protection conditions

Specific data protection conditions may also apply when you use certain special services, and you will be informed of these before you use the service.

In any case, the data subjects are obliged to provide the relevant personal data to Andor60 / DVM Group in accordance with the applicable legislation. In particular, they must have appropriate and informed consent or other legal basis for providing the personal data (for example: in the case of providing data of contacts, relatives). If Andor60 / DVM Group becomes aware that data of a data subject has been disclosed without consent or other appropriate legal basis, Andor60 / DVM Group may delete the data without undue delay and the data subject shall be entitled to exercise the rights and remedies provided for in this Notice.

Andor60 / DVM Group shall not be liable for any damage, loss or injury that may result from the breach of the above commitment and representation by the parties concerned.

4. Scope of data processed and purposes of data processing

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The scope of the personal data processed by Andor60 / DVM Group, the purposes of the processing and the duration of the processing are described in detail in the list below.

In summary, the purposes of data processing are:

- Preparing the real estate sales contract between Andor60 / DVM Group clients and the sellers of the properties they wish to buy, in particular by providing information on the properties you are looking for. In connection with the execution of the real estate sales contract, Andor60 / DVM Group transmit the contact details of the customers (name, address, e-mail, telephone number) to the joint representatives of the condominiums.
- Transmission of data to the chosen condominium manager. Provision of property management services and related property rental, real estate brokerage and other services.
- Create an online account on one of the Andor60 / DVM Group websites.
- Sending promotional material by e-mail and/or telephone (direct acquisition) by Andor60 / DVM Group.
- Post-purchase satisfaction surveys, such as verbal, written, e-mail or telephone surveys, following the purchase of a home or the use of Andor60 / DVM Group services.
- Customer information sent by e-mail from Andor60 / DVM Group.
- Preparation of loan and invoice agreements related to the sale and purchase of real estate.
- Deploy and operate a Smart Home system and devices to automate your home in your residential property.
- Processing of data of contact persons of other contractual partners acting in connection with contracts not mentioned in this Notice and of persons involved in the performance and monitoring of performance for the purpose of the performance (day-to-day execution) of the contract.
- Processing of data of contractors and contact persons of contractors and persons involved in the performance and monitoring of performance for the purposes of any other action related to compliance with the contract or the performance of the contract, including seeking remedies necessary to ensure contractual rights.
- Processing of data of contractors and contact persons of contractors and persons involved in the performance and monitoring of performance for the purposes of any other action related to compliance with the contract or the performance of the contract, including seeking remedies necessary to ensure contractual rights.
- Processing related to the enforcement of the data protection rights of the data subjects (for details, see point 9).
- Archiving the data subjects' consents to data processing and any withdrawal of consent.

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- Records of data protection incidents (including documentation of the steps taken to deal with incidents).

If a processing purpose is necessary for the purposes of the legitimate interests pursued by Andor60 / DVM Group or a third party, the interest balancing test used to determine the legitimate interest will be made available by Andor60 / DVM Group upon request to one of the contact details above.

Andor60 / DVM Group expressly draws the attention of data subjects to the fact that they have the right to object at any time, on grounds relating to their particular situation, to processing of their personal data based on legitimate interests, including profiling based on the aforementioned provisions. In this case, the Andor60 / DVM Group will no longer process the personal data, unless the data subject proves compelling legitimate grounds for the processing which override the interests, rights and freedoms of the data subject, or for the establishment, exercise or defence of legal claims.

If personal data are processed for direct marketing purposes, the data subject shall have the right to object at any time to the processing of personal data concerning him or her for such purposes, including profiling, where it is related to direct marketing.

When you unsubscribe from receiving promotional material, you will receive a confirmation link to the email address you have provided, which you will need to click to confirm your request in order to unsubscribe. This confirmation is important to ensure that Andor60 / DVM Group is satisfied that the person requesting to unsubscribe is not a robot, is acting on their own behalf, is confirming their request in relation to their own email account and is using a genuine email address. The confirmation link is valid for 48 (forty-eight) hours. The unsubscribe period starts at the time of confirmation. If you do not confirm your unsubscription within 48 hours, the link will expire and a new link will be requested.

The legal basis and duration of each processing operation are essentially the following legal provisions
was determined on the basis of:

- "Art." - Act CL of 2017 on the Rules of Taxation. Andor60 / DVM Group is obliged to keep the data supporting the tax documents.

- "Ptk." - Act V of 2013 on the Civil Code. If the period of limitation for the enforcement of a claim is specified in the Prospectus as the period of processing, the act interrupting the limitation period shall extend the period of processing until the new date on which the limitation period starts to run (Civil Code. 6:25 (2)). In the event of the expiry of the limitation period, the claim may be enforced within a period of one year from the date of the removal of the obstacle - three

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months if the limitation period is one year or less - even if the limitation period has already expired or is less than the above period (Civil Code, Art. 6:24. § (2)).

- "Advertising Act": Act XLVIII of 2008 on the Basic Conditions and Certain Restrictions of Economic Advertising Activities.

- "Accounting Act" - Act C of 2000 on Accounting. Certain information, for example, that forms part of the supporting accounting documents or is contained in documents relating to the conclusion of a contract between Andor60 / DVM Group and its contractual partner (e.g. a sales contract), the supporting accounting documents or the invoice issued, must be retained by Andor60 / DVM Group under the Accounting Act. The 8-year data retention period under the Accounting Act is calculated from the date on which an accounting entry relating to the data occurred in the year or the reporting/bookkeeping relied in any way on the data.

In practice: if the data is included in a contract under which several deliverables are provided (e.g. several services are provided under one contract), the 8 years should be calculated separately for each deliverable, because each deliverable is invoiced separately and the transaction is accounted for separately. If the data are included in a contract for the sale of an item (the delivery takes place and the contract is terminated on completion), the contract and the invoice are used to record the transaction in the year in question, and the 8 years start from there.

5. Transfer of personal data to our contractual partners

Andor60 / DVM Group uses the following contractual partners to carry out tasks related to data processing operations, in addition to the contractual partners specifically named in this Notice.

In summary, **the contractual partners** are:

Realpad, s.r.o. - hosting and data management - CRM system

Beyond Visual Ltd. - data processor

BM Real Estate Ltd. - preparation of sales contract (as seller)

Kende.Molnár-Bíró.Katona Lawyers Association - Molnár Tamás Law Office - data controller and data storage of the sales contract

Rackforest Ltd. - hosting services

Linemedia Ltd. - website development and maintenance

Outdoor Media Audit Ltd. - media buying, outdoor media space, poster production

MITTE Communications Ltd. - communications consultancy, media buying, online advertising management, website maintenance

The contracted partner acts as a so-called "data processor": it processes the personal data set out in this Notice on behalf of Andor60 / DVM Group. Andor60 / DVM Group may only use data processors that offer adequate guarantees, in particular in terms of expertise, reliability and resources, to implement technical and organisational measures to ensure compliance with the requirements of the

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GDPR, including the security of data processing. The specific tasks and responsibilities of the data processor are governed by the contract between Andor60 / DVM Group and the data processor. After the processing has been carried out on behalf of Andor60 / DVM Group, the processor shall, at Andor60 / DVM Group's option, return or delete the personal data, unless the storage of the personal data is required by EU or Member State law applicable to the processor.

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

We use cookies in certain areas of the <https://andorliget.hu> website. Cookies are files that store information on your web browser. For example, cookies allow the website to recognise if you have visited it before, or help us understand which parts of the website are the most popular by letting us see which pages our visitors go to and how long they spend there. By studying this, we can better tailor the website to your needs and provide you with a more varied user experience. We also use cookies to ensure that the information you see on your next visit will be relevant to your expectations as a user (without identifying you personally). When you visit one of our websites, we may also automatically collect technical information that does not identify you personally. For example, the name of another website that directed you to this website, the location of the website you accessed, the searches you made on the website. Collecting this information helps us to identify the preferred search patterns of our website users without using any personal data.

This information is used internally only. Anonymous or general data, from which your identity cannot be identified, is not considered personal data and is therefore not covered by this Notice.

You can set your web browser to accept all cookies, reject all cookies, or notify you when a cookie is sent to your computer. Each web browser is different, so please use your browser's "Help" menu to change your cookie settings. For more information about the nature of cookies and how to turn them off, please visit <http://www.youronlinechoices.com/hu/>. The <https://andorliget.hu> website is designed to work using cookies, so turning them off may affect the usability of the website and prevent you from taking full advantage of it.

For the most commonly used browsers, the cookie management menu items:

[Mozilla Firefox](#)

[Google Chrome](#)

[Internet Explorer](#)

Google Analytics provides additional options for Google Analytics

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to unsubscribe from services: <http://tools.google.com/dlpage/gaoptout?hl=en-GB>.

7. Personal data relating to children and third parties

Persons under the age of 16 are not allowed to provide personal information about themselves unless they have asked their parents for permission. By providing personal data, you represent and warrant that you will act in accordance with the above and that your capacity to act in relation to the provision of information is not limited.

If you are not legally entitled to provide any personal data on your own, you must obtain the consent of the third party concerned (e.g. legal representative, guardian, other person on whose behalf you are acting) or provide another legal basis for providing the data. In this context, you are required to consider whether the consent of a third party is necessary in connection with the provision of the personal data. In some cases, Andor60 / DVM Group may not have any personal contact with the data subject, so you are responsible for ensuring compliance with this point and Andor60 / DVM Group shall not be liable in this regard. Notwithstanding this, Andor60 / DVM Group shall at all times be entitled to verify whether the appropriate legal basis for processing any personal data is available. For example, if you are acting on behalf of a third party, we are entitled to ask for your authorisation and/or the relevant consent of the data subject in relation to the matter in question.

We will use all reasonable efforts to delete any information that has been unlawfully disclosed to us and will ensure that such information is not disclosed to or used by others (whether for advertising or other purposes). Please let us know immediately if you become aware that a child has unlawfully disclosed personal information about you or a third party. You can contact us using the contact details highlighted at the beginning of this Notice.

8. Data security measures

Andor60 / DVM Group protects the personal data it processes by restricting access to and use of the information. For example, only those persons who need to have access to the data in order to achieve the aforementioned purposes.

9. Data protection rights and remedies

For details of your data protection rights and remedies, please see the relevant GDPR provisions of the GDPR (in particular, Articles 15, 16, 17, 18, 19, 20, 21, 22, 77, 78, 79, 80 and 82 of the EC Treaty).

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The summary below contains the most important provisions and Andor60 / DVM Group will provide you with information about your rights and remedies in relation to data processing accordingly.

Please note that you have the right to request human intervention by Andor60 / DVM Group in relation to the profiling (sending of advertising material, processing of related housing search preferences) referred to above in the Notice, and to express your views as set out in this section and to bring them to the attention of Andor60 / DVM Group, and to object to the decision taken following the profiling at Andor60 / DVM Group.

In this case, Andor60 / DVM Group will investigate the decision with human intervention, taking into account the information you have provided, and will inform you of the outcome.

The information must be provided in writing or by other means, including electronic means where appropriate. At your request, information may also be provided orally, provided that you have provided proof of your identity by other means. Proof of identity will be provided electronically by sending you a confirmation link to the email address you have provided, where you will be asked to confirm your request for information. Confirmation is important to ensure that the person requesting the information is not a robot, is acting on their own behalf, is confirming their request in their own email account and is using a real email address. The confirmation link is valid for 48 hours. The information period starts at the time of confirmation. If you do not confirm the information request within 48 hours, the link will expire and a new link will be requested.

Andor60 / DVM Group will inform you, without undue delay and in any event within one month of receiving your request concerning the exercise of your rights (see Articles 15-22 GDPR), of the measures taken in response to your request. If necessary, and taking into account the complexity of the request and the number of requests, this time limit may be extended by a further two months. Andor60 / DVM Group will inform you of the extension, stating the reasons for the delay, within one month of receipt of the request. If you have submitted your request electronically, the information shall be provided electronically where possible, unless you request otherwise.

If Andor60 / DVM Group does not take action on your request, it will inform you without delay, but at the latest within one month of receipt of the request, of the reasons for the failure to act, of the possibility to lodge a complaint with a supervisory authority and of your right to judicial remedy.

9.1 Your right of access

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(1) You have the right to receive feedback from us on whether your personal data is being processed. If such processing is ongoing, you have the right to access your personal data and the following information:

- a) the purposes of the processing;
- b) the categories of personal data concerned;
- (c) the recipients or categories of recipients to whom the personal data have been or will be disclosed, including in particular recipients in third countries or international organisations;
- (d) where applicable, the envisaged duration of the storage of the personal data or, where this is not possible, the criteria for determining that duration;
- (e) your right to request us to rectify, erase or restrict the processing of personal data concerning you and to object to the processing of such personal data;
- (f) the right to lodge a complaint with a supervisory authority; and
- g) if the data was not collected from you, any available information about its source.

information;

- (h) the fact of automated decision-making, including profiling, and, at least in these cases, the logic used and clear information on the significance of such processing and its likely consequences for you.

(2) If personal data are transferred to a third country, you have the right to be informed of the appropriate safeguards for the transfer.

(3) We will provide you with a copy of the personal data processed. If you have submitted your request electronically, the information shall be provided in a commonly used electronic format unless you request otherwise.

9.2 Right to rectification

You have the right to have inaccurate personal data about you corrected without undue delay at your request. You have the right to request that incomplete personal data be completed, including by means of a supplementary declaration.

9.3 Right to erasure ("right to be forgotten")

You have the right to have your personal data deleted without undue delay at your request if one of the following grounds applies:

- a) the personal data are no longer necessary for the purposes for which they were collected or otherwise processed;
- (b) you withdraw your consent on the basis of which the data are processed and there is no other legal basis for the processing;
- (c) you object to the processing and, where applicable, there are no overriding legitimate grounds for the processing;
- d) the personal data have been unlawfully processed;
- (e) the personal data must be erased in order to comply with a legal obligation under EU or Member State law applicable to us; or

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f) the personal data were collected in connection with the provision of information society services.

For the technical rules on deleting your account, please see the relevant purpose.

(2) If Andor60 / DVM Group has disclosed personal data and is obliged to delete it pursuant to paragraph (1), it shall take reasonable steps, including technical measures, taking into account the available technology and the cost of implementation, to inform the data controllers that the data subject has requested the deletion of the links to or copies or replicas of the personal data in question.

(3) Paragraphs 1 and 2 shall not apply where the processing is necessary for, inter alia:

- a) for the exercise of the right to freedom of expression and information;
- (b) for the purposes of complying with an obligation under EU or Member State law that requires the processing of personal data that is applicable to us;
- (c) for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes, where the right referred to in paragraph 1 would be likely to render such processing impossible or seriously impair it; or
- (d) for the establishment, exercise or defence of legal claims.

9.4 Right to restriction of processing

(1) You have the right to restrict processing at your request if one of the following conditions is met:

- a) You contest the accuracy of the personal data, in which case the restriction applies for the period of time that allows us to verify the accuracy of the personal data;
- (b) the processing is unlawful and you oppose the erasure of the data and instead request the restriction of their use;
- (c) we no longer need the personal data for the purposes of processing, but you require it for the establishment, exercise or defence of legal claims; or
- (d) you have objected to the processing; in this case, the restriction applies for the period until it is established whether the legitimate grounds of Andor60 / DVM Group prevail over the legitimate grounds of the data subject.

(2) Where processing is restricted pursuant to paragraph (1), such personal data may be processed, except for storage, only with your consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another person or legal entity or for important public interests of the Union or of a Member State.

(3) You will be informed in advance of the lifting of the restriction on processing.

9.5 Obligation to notify the rectification or erasure of personal data or restriction of processing

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Andor60 / DVM Group will inform all recipients of any rectification, erasure or restriction of processing to whom or with which the personal data have been disclosed, unless this proves impossible or involves a disproportionate effort. We will inform you of these recipients at your request.

9.6 Right to data portability

(1) You have the right to receive the personal data concerning you that you have provided to us in a structured, commonly used, machine-readable format and the right to transmit such data to another controller without hindrance from Andor60 / DVM Group if:

- (a) the processing is based on consent or on a contract; and
- (b) the processing is carried out by automated means.

(2) In exercising the right to data portability under paragraph (1), you have the right to request, where technically feasible, the direct transfer of personal data between controllers.

9.7 The right to object

(1) You have the right to object at any time, on grounds relating to your particular situation, to the processing of your personal data based on legitimate interests, including profiling. In this case, we will no longer process the personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims.

(2) Where personal data are processed for direct marketing purposes, you have the right to object at any time to the processing of personal data concerning you for such purposes, including profiling, where it is related to direct marketing. When unsubscribing from receiving promotional material, you will receive a confirmation link to the email address you have provided, where you will be asked to confirm your request to unsubscribe. The confirmation is important to ensure that the person requesting to unsubscribe is not a robot, is acting on their own behalf, is confirming their request in their own email account and is using a real email address. The confirmation link is valid for 48 hours. The unsubscription becomes valid upon confirmation. If you do not confirm your unsubscription within 48 hours, the link will expire and a new link will be requested.

(3) If you object to the processing of your personal data for direct marketing purposes, your personal data will no longer be processed for these purposes.

(4) In the context of the use of information society services and by way of derogation from Directive 2002/58/EC, you may exercise your right to object by automated means based on technical specifications.

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(5) Where personal data are processed for scientific or historical research purposes or statistical purposes, you have the right to object to the processing of personal data concerning you on grounds relating to your particular situation, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

9.8 Right to lodge a complaint with a supervisory authority

You have the right to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work or place of the alleged infringement, if you believe that the processing of personal data relating to you infringes the GDPR. The competent supervisory authority in Hungary is the National Authority for Data Protection and Freedom of Information (<http://naih.hu/>;

1530 Budapest, Pf.: 5.; phone: +36-1-391-1400; fax: +36-1-391-1410; e-mail mail: ugyfelszolgalat@naih.hu).

9.9 Right to an effective judicial remedy against the supervisory authority

(1) You have the right to an effective judicial remedy against a legally binding decision of the supervisory authority which applies to you.

(2) You have the right to an effective judicial remedy if the competent supervisory authority does not deal with the complaint or does not inform you within three months of the procedural developments concerning the complaint or of the outcome of the complaint.

(3) Proceedings against a supervisory authority shall be brought before the courts of the Member State in which the supervisory authority is established.

9.10 Right to an effective judicial remedy against the controller or processor

(1) You have the right to an effective judicial remedy if you consider that your rights under the GDPR have been infringed as a result of the processing of your personal data in a way that does not comply with the GDPR.

(2) Proceedings against a controller or processor shall be brought before the courts of the Member State in which the controller or processor is established. Such proceedings may also be brought before the courts of the Member State in which the data subject has his or her habitual residence. Such proceedings shall be subject to the jurisdiction of the courts in Hungary. The data subject may also bring the action before the court (tribunal) having jurisdiction for the place of his or her domicile or residence, at his or her choice. Information on the jurisdiction and contact details of the courts (tribunals) can be found on the following website for more information: www.birosag.hu.