

## **Privacy Policy**

*Last updated on 04 November 2020*

### **Overview**

Maintaining the security of your data is a priority at Projekt Fejlesztő Bt. and we are committed to respecting your privacy rights. We pledge to handle your data fairly and legally at all times. Projekt Fejlesztő Bt. is dedicated to being transparent about what data we collect about you and how we use it.

This Privacy Policy outlines the manner in which we manage personal information obtained through or displayed on the Website or otherwise provided by users (“you”, “your”) of networking services (“Services”) via the Website. It applies whenever you visit this website, including any mobile website (together the “Website”), and provides you with information about:

- what personal data we collect;
- how we use your data;
- how long we retain your data;
- how we ensure your privacy is maintained; and
- your legal rights relating to your personal data.

Please read this policy carefully to understand our views and practices regarding your personal data and how we will treat it. By using the Website, you are taken to have read and agreed to the collection, use, disclosure and handling of your personal information in accordance with this Privacy Policy.

### **Sharing your information with our other websites in the same network**

This means that when you sign up to our Services, any content you post to the Website will be searchable and available to users of the Services who access it via different websites in the same network as the Website. It also means that you may view and communicate with other members of the Services who have registered with and accessed the Service through different websites in the same network. You will have no control over which websites within a network your data is shared with, but you will always be able to block unwanted individuals from any website within the network from accessing your profile and interacting with you.

These will only be websites in the same network as this Website. These networks group you together with members of the Services compatible Services to this one.

By registering with this Website you acknowledge and accept that the personal information you provide in connection with the Service may be shared with our other websites in the manner described above.

### **Data Controller**

For the purposes of the General Data Protection Regulation (“GDPR”) and any other data protection laws applicable Hungary, we confirm that the data controller of this website is Projekt Fejlesztő Bt., a company registered under the laws of Hungary, whose registered office is 5322 Tiszaszentimre, Kenderfűl utca 2.

What personal information do we collect about you and from whom?

When you access, subscribe or sign up to use the Website, we may collect a variety of personal information about you, including:

#### Information we collect directly from you

- personal information required to subscribe or create a member profile, such as your name, phone number, postal address, email address, contact details, photographs, age, gender, sexuality, religious beliefs, race, nationality, interests, marital status, location and bank/credit card details;
- some of the information you choose to provide us may be considered "special" or "sensitive" in certain jurisdictions, for example your racial or ethnic origins, sexual orientation and religious beliefs. By choosing to provide this information, you consent to our processing of that information;
- personal information provided to us if you contact us, such as your contact details in our records of that correspondence;
- personal information provided to us if you choose to complete any surveys or questionnaires for us, enter a competition or promotion of ours or participate in forums, discussion boards or other social media functions on our Website;
- personal information if you post or transmit information via the Website to other users; and
- records of which of our Services you are interested in and which Services you purchase.

#### Information we receive from other sources

- technical information regarding your visits to the Website including, but not limited to, traffic data, location data, weblogs and other communication data;
- any personal information you provide to any of the other websites we operate or the other services we provide (in which case we will have informed you when we collected that data that it may be shared internally and combined with data collected on this site);
- any relevant personal information that you may have submitted to our third party service providers in the course of them providing the Services on our behalf, including for example, business partners, sub-contractors in technical, payment and delivery services, fraud prevention agencies, advertising networks, analytics providers, search information providers, credit reference agencies.

#### Why do we collect your personal information and on what grounds?

We will only use your personal data if we have a permitted lawful basis to do so. Generally we collect your personal data because it is necessary for:

- performing our contract for the Services with you;
- the pursuit of our legitimate interests (as set out below); or
- complying with our legal obligations.

We may also rely on your consent to use your personal data for:

- marketing purposes (see "Marketing Communications" below);
- administering prize draws, competitions or promotions; and
- in order to collect certain sensitive personal data about you necessary to provide the Services (including your sexuality, racial or ethnic origin or your religious beliefs).

You have the right to withdraw your consent to these activities at any time, which will mean (unless another lawful basis applies to your data) that we will cease to process the affected data after consent is withdrawn. However, please note this may result in us being unable to provide you with certain features of the Website and/or Services.

The primary purpose for which we collect information about you is to provide you with Services you have requested in subscribing or signing up to use the Website (i.e. to perform our contract with you). We also collect information about you for the following purposes:

#### **To perform our contract with you**

- To process your communications, your membership of and subscription to the Website and to enable your use of the Website and the Services;
- For selling and supplying and services to you;
- To provide customer care services. For the avoidance of doubt, we will only store limited Credit Card or Debit Card information for the purpose of assisting with customer care enquiries;
- To open and run your account;
- For continuity of service, (e.g. to restore your profile if you are coming back onto the Website after a long break). This will be in accordance with our data retention practices (see “How long do you keep hold of my personal information?” below);
- To provide you with information, products or services that you request from us; and
- For handling customer contacts, queries, complaints or disputes.

#### **For our legitimate interests**

- For promoting, marketing and advertising our services;
- For statistical and demographic analysis, in order to understand our customers’ behaviour, activities, preferences, and needs;
- For improving existing services and developing new products and services;
- To protect Projekt Fejlesztő Bt. and our customers, by taking appropriate legal action against third parties who have committed criminal acts or are in breach of legal obligations to Projekt Fejlesztő Bt.;
- To effectively handle any legal claims or regulatory enforcement actions taken against Projekt Fejlesztő Bt.;
- To provide you with an up to date, efficient and reliable Service;
- To investigate any complaints about or made by you, or if we have reason to suspect that you are in breach of the Website terms of use or that you have otherwise engaged in any unlawful activity;
- To generally run the Website and for internal operations, in order to provide you with an up to date, efficient and reliable Service; and
- To monitor and record telephone calls for training purposes and to improve the Service to you.

#### **To comply with our legal obligations**

- To help prevent fraudulent activity, including on your account (for example, if we collect your card details we will check these details with credit agencies and reserve the right to refuse to make available the Website and/or our Services if, for example, the card details provided are reported to be fraudulent or credit agencies report the activities as being fraudulent);
- To monitor and record telephone calls for training purposes and to improve the Service to you;
- To comply with our legal and regulatory obligations (including under applicable data protection laws);
- For preventing, investigating and detecting crime, fraud or anti-social behaviour and prosecuting offenders, including working with law enforcement agencies; and

- To fulfil our duties to our customers, colleagues, shareholders and other stakeholders.

### **Marketing communications**

Where you have opted into marketing communications, you agree that we may use your information to contact you by your chosen method of electronic mail (e.g. by email and SMS) about tailored offers, events, competitions, items or related activities that you may find useful, as well as other similar products and services offered by us or any of our related entities from time to time. We do not sell, trade or rent your personal information to other companies and partners.

You may receive marketing communications from Projekt Fejlesztő Bt., during the term of your membership (whether full or basic) unless you unsubscribe from receiving such marketing communications as set out below.

### **How to unsubscribe from receiving Marketing communications?**

If you have consented to receive marketing communications, you may always revoke that consent at any time by changing your settings on the Website or exercising the "unsubscribe" option in any marketing communications you get from us.

Who do we disclose your information to?

We may disclose your personal information to any member of our group.

- We may also disclose your personal information to third parties:
- authorised by you to receive information held by us (including other members using the Website, associated websites and our Services);
- for the purpose of asking that third party to provide goods or services on our behalf, including but not limited to carrying out data analysis, cleansing, processing credit card information, mail outs, debt collection, marketing, research and advertising;
- that are our agents, business partners or joint venture entities or partners;
- that are associated websites (as noted above, our Services may be offered through and accessible via a number of other websites in addition to this Website ("Associated Websites") and data that you post to the Website for access by members of the Website may be searchable and available to users of the Website Services who access it via Associated Websites);
- that sponsor or promote any competition that we conduct or promote via our Services or
- if we are under a duty to disclose or share your personal data with such parties in order to comply with any legal obligation, or in order to enforce or apply our terms of use; or to protect the rights, property, or our safety, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction, or to the Police and any relevant authority or enforcement body (including your Internet Service Provider or network administrator).

You agree that if we transfer ownership or management of the Website, our Services, the business and/or the assets (in whole or in part) to a third party in the event that we sell, trade or licence any part of the business or assets, that we may also transfer your personal data or other personal data you have provided to us as part of those assets, including all sensitive personal data and any other information about you to such third party, provided such third party agrees to observe this policy.

How do we restrict access to your personal information on the Service?

We respect and are committed to protecting your privacy and that of other users, and wherever possible we require you to provide login information and identify yourself to access the Website.

We also make an effort to ensure that members of the Service are not connected with other members that may be inappropriate. To do this we may apply classifications to Associated Websites that provide access to the Service, including to the Website. These classifications may restrict the availability of:

- communications between yourself and other members of the Service;
- the details of other members of the Service to yourself; and
- your details to other members of the Service.

### **How long do you keep hold of my personal information?**

We remove onsite activity periodically throughout your membership. If you delete your profile or your free profile is inactive for 18 months, all information is deleted from the account and from the Company's records apart from your gender, sexuality and payment records (excluding card information), which are all retained by the Company in an anonymous way. Profile information is deleted from our servers within 10 hours from either the profile being deleted or inactive for 18 months, or if the profile is active, from yourself deleting or amending your personal information.

### **Do you transfer my personal data abroad?**

All of your data is stored on our servers in Hungary. However, a number of our suppliers (including providers of our content delivery, cloud platform, payment systems and mailing services) are based outside of the European Economic Area, which may require us to transfer your personal data to jurisdictions which are not subject to equivalent standards of data protection laws (including the US). Where such international transfers are necessary, we will ensure that these are made subject to appropriate safeguards (including by using EU Commission approved standard contractual clauses). All organisations who we transfer data to in the US are certified under the Privacy Shield framework. You can request further details about the safeguards we use when transferring your data abroad by contacting us at the details below, and view the list of Privacy Shield participants on <https://www.privacyshield.gov/list>.

### **Security of Personal Information**

Transmission of data and information via the Website is not a secure or encrypted transmission method for sending your personal data, unless otherwise indicated on the Website. Accordingly, your attention is drawn to the fact that any information and personal data carried over the internet is not secure and any transmission is at your own risk. Information and personal data may be intercepted, lost, redirected, corrupted, changed and accessed by other people.

We take reasonable steps to protect the personal information we hold from misuse and loss, and from unauthorised access, modification or disclosure. For example, we set strict security standards to prevent any unauthorised access to your personal information once we have received it and wherever possible we will use adequate security software and working procedures to ensure the security of your personal information. To prevent unauthorised access, maintain accuracy, and ensure proper use of personal information, we have

employed physical, electronic, and managerial processes to safeguard and secure the information we collect online.

## **Cookies**

Our Website uses cookies to distinguish you from other users of our Website. Cookies are small pieces of removable data that are stored by the web-browser on your computer, mobile phone or other device that identifies your computer, mobile phone or other device when you visit the Website. We use cookies to improve the Website and the Services available to you.

Your rights in respect of your personal data

Under certain circumstances, you have rights under data protection laws in relation to the personal data we hold about you. You can request to:

- access information held about you. Please note that we reserve the right to request for proof of your ID to process the request, and to charge you a reasonable administrative fee for any repetitive, manifestly unfounded or excessive requests. If we refuse your request to exercise this right, we will give reasons for our refusal and allow you to challenge our decision.
- rectify any incorrect or incomplete data we hold about you. It is both in our interest and yours that any personal information we hold about you is accurate, complete and current. If the data we hold about you is inaccurate in any way, please contact us to have your personal information corrected.
- delete, restrict or remove the data we hold about you.
- transfer the data we hold about you to another party.
- object to any further processing of your data.

You can make all such requests via email to [patrimoniumapartments@gmail.com](mailto:patrimoniumapartments@gmail.com).

Please note that in respect of all these rights we reserve the right to refuse your request based on the exemptions set out in the applicable data protection laws.

If you have any concerns about how we handle your data, please contact us. If you are not satisfied after we've tried to resolve your issue, you'll be entitled to lodge a complaint with our data protection regulator, Szolnoki Törvényszék, 5000 Szolnok Kossuth Lajos út 1.

## **Third party links on the Website**

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that (unless these are our Associated Websites) these websites have their own privacy policies and that we are not in control of, and do not accept any responsibility or liability for these policies or any third party website linked to the Website. Please check these policies before you submit any personal information through these websites.

## **Changes to this policy**

We may review and amend this Privacy Policy to take into account changes in law, technology and our operations. We will post any changes to this Privacy Policy on the Website and, where appropriate, notify you by email. Please periodically review this Privacy Policy before using the Website as continued use of the Website shall indicate your acceptance of any changes. All personal information held by us will be governed by the most recent Privacy Policy posted on the Website.

## **Contact Us**

If you have any questions or comments about this Privacy Policy, including requests to access or modify the use of your personal data, you can contact our Data Protection Officer by emailing [patrimoniumapartments@gmail.com](mailto:patrimoniumapartments@gmail.com).

For other general queries, Projekt Fejlesztő Bt.. can be contacted via the contact section on the Website or by writing to our registered address.