

Budapest ONE OFFICE BUILDING
DATA PROTECTION POLICY FOR BUSINESS AND MARKETING PROMOTIONS

1. ORGANIZER AND OPERATOR OF PROMOTIONS

BP1 Első Ütem Ingatlanfejlesztő Zártkörűen Működő Részvénytársaság (Registered office: 1082 Budapest, Futó utca 47-53. 7th floor; Tax number: 28792369-2-42, Company registration number: 01-10-141034)

Futureal Prime Properties Ingatlanfejlesztő Zártkörű Esernyőalap – Futureal Prime Properties Three Ingatlanfejlesztő Részalap (Registered office: 1082 Budapest, Futó utca 43-45. 6th floor; Tax number: 18789311-2-42)

Futureal Prime Properties Ingatlanfejlesztő Zártkörű Esernyőalap - Futureal Prime Properties Two Ingatlanfejlesztő Részalap (Registered office: 1082 Budapest, Futó utca 43-45., 6th floor; Tax number: 18789256-2-42)

hereinafter: 'Organizer'

2. CONTENT OF THE PROMOTIONS

The Organizer is entitled to collect data from the employees of the office building tenants ('Participant') in the common areas of the Budapest ONE office building owned by the Organizer, for the purpose of sending direct marketing circulars with business and marketing content to the resulting database ('Promotion'). Providing the name of the company employing the Participant is a prerequisite; this data helps the Organizer determine which companies' employees can be most effectively reached with its promotions.

Topics of business and marketing circulars include, for example: (i) offers and surprises, (ii) coupons, (iii) invitations to participate in challenges, market research, satisfaction surveys, and questionnaires, as well as the evaluation thereof, and (iv) invitations to campaigns and games.

Consent to receive marketing messages is voluntary; however, subscribers are entitled to withdraw their consent at any time later (i.e., to unsubscribe).

3. DATA PROTECTION INFORMATION

Scope of processed data:

- The Participant's name
- The Participant's e-mail address
- The name of the Participant's employing company

Legal basis for data processing: Article 6(1)(b) of the EU General Data Protection Regulation ("**GDPR**") – processing is necessary for the performance of the obligations undertaken in the Promotion by the Organizer, based on Section 6:588 [Prize Competition] of Act V of 2013 on the Civil Code ("**Civil Code**").

In the case of special promotions, **automated decision-making** occurs exclusively during the potential drawing of winners, with the assistance of artificial intelligence.

The Organizer processes personal data for **5 years** pursuant to Section 6:22 of the Civil Code. If the data must be retained for tax purposes based on Act CL of 2017 on the Tax Administration, the retention period is **6 years**; in the case of accounting retention obligations (based on Act C of 2000 on Accounting), this period is **8 years**—for example, if the data forms part of the documents supporting the Organizer's bookkeeping.

The Organizer sends promotional messages using the **Mailchimp** service. The service is provided by The Rocket Science Group LLC d/b/a MailChimp (Registered office: 675 Ponce De Leon Ave NE, Suite 5000 Atlanta, Georgia 30308, USA). While US laws do not provide the level of data protection defined by the GDPR, the provider ensures data protection guarantees through participation in the **EU-U.S. Data Privacy Framework**.

The data protection rights and legal remedies of data subjects are detailed in the relevant provisions of the GDPR (specifically Articles 15, 16, 17, 18, 19, 20, 21, 22, 77, 78, 79, 80, and 82).

4. ANNEX: DATA PROTECTION RIGHTS AND REMEDIES

1.1 Time Limits

The Organizer shall fulfill the data subject's request to exercise their rights within a maximum of one month from receipt. The day of receipt does not count towards the deadline.

The Organizer may extend this deadline by a further two months where necessary, taking into account the complexity and number of requests. The Organizer shall inform the data subject of the extension within one month of receipt, stating the reasons for the delay.

1.2 Right of Access

The data subject is entitled to request information from the Organizer as to whether their personal data is being processed, and if so, to know:

- Which personal data is processed;
- On what legal basis;
- For what purpose;
- For how long;
- To whom, when, and under what law the Organizer provided access to or transferred the data;
- The source of the data;
- Whether the Organizer uses automated decision-making and its logic, including profiling.

The Organizer shall provide a copy of the personal data undergoing processing free of charge for the first time; for further copies, it may charge a reasonable fee based on administrative costs. To ensure data security, the Organizer must verify the identity of the person exercising the right of access.

1.3 Right to Rectification

The data subject may request the modification of their personal data. If the data subject can credibly verify the accuracy of the rectified data, the Organizer shall fulfill the request within one month and notify the person.

1.4 Right to Restriction of Processing (Blocking)

The data subject may request that the Organizer restricts the processing of their data if:

- The accuracy of the data is contested (restriction applies for the period of verification);
- The processing is unlawful, but the data subject opposes erasure and requests restriction instead;
- The Organizer no longer needs the data, but the data subject requires it for legal claims;
- The data subject has objected to the processing (restriction applies until it is determined whether the Organizer's legitimate grounds override those of the data subject).

1.5 Right to Object

The data subject has the right to object at any time, on grounds relating to their particular situation, to the processing of their personal data based on legitimate interest. In this case, the Organizer must demonstrate compelling legitimate grounds for processing.

1.6 Right to Erasure ("Right to be Forgotten")

The data subject is entitled to have their personal data erased without undue delay if:

- a) The data is no longer necessary for the original purpose;
- b) The data subject objects and there are no overriding legitimate grounds;
- c) The data was processed unlawfully.

The right to erasure does not apply if processing is necessary for the establishment, exercise or defense of legal claims.

1.7 Right to Legal Remedy

If the data subject believes the Data Controller has violated data protection requirements:

- They may lodge a complaint with the National Authority for Data Protection and Freedom of Information (NAIH - 1055 Budapest, Falk Miksa utca 9-11; www.naih.hu).
- They may turn to the court. The data subject may choose to file the lawsuit before the tribunal (törvényszék) competent for their place of residence, stay, or the Organizer's registered office.