



Matthew & Daniel's Real Estate

Privacy Policy

We value the trust of our customers and are committed to protect their personal information and their rights to self-determination. We always handle the data of our customers transparently in accordance with the laws in force at any given time. We only collect and process personal information in accordance with the law. We may send you a system message at any time without your consent, but we will only send you a marketing newsletter if you have given us permission to do so. We handle and store the processed data in the most secure way possible, and we transfer it to third parties only with the consent of the data owner or within the framework of our legal obligation.

Based on the General Data Protection Regulation (GDPR, (EU) 2016/679) of the European Parliament and of the Council - entered into force on 25 May 2018 - our data management policies have changed as follows.

Data controller: Matthew & Daniel's Kft.

Address: 1061 Budapest, Dalszínház u. 10. fsz. 3.

WEB lapja: www.matthewdanielsrealty.com (*not accessible for the blind and partially sighted*) A data protection officer is not employed by the Company.

GLOSSARY - INTERPRETATIONS OF TERMS USED IN THE RULES

Personal data: Any information relating to a natural person (Data Holder) with which it can be directly or indirectly identified. Examples of such information are name, phone number, email address, place and time of birth, online ID, location data. The photo or sound recording is also considered personal data.



Data management consent: The Data Holders' clear, voluntary and firm, informed consent to the full or detailed processing of personal data concerning him or her.

Data Handling: The set of operations performed on data in an automated or non-automated manner, such as collecting, recording, modifying, storing, transforming, accessing, using, deleting, transmitting, distributing or destroying data, in effect of all operations performed on data.

Data Manager: The natural or legal person, an organisation without legal personality or a public authority who determines the purposes and means of the processing of personal data independently or together with others, makes decisions on data management and its means, implements it alone or with an authorised data processor.

Data Processor: A natural or legal person, an organisation without legal personality or a public authority or other authority which acts on behalf of the controller on its behalf and processes the data in the manner and by the means specified by the controller.

Privacy Incident: A breach of security resulting in an accidental or unlawful destruction, loss, alteration, unauthorised disclosure or access to personal data transmitted, stored or otherwise handled.

Data Transmission: The operation by which the data controller allows access to the recorded data to a third party. Data transfer is necessary when the operation on which the data processing is based can only be performed with the involvement of a third party.

Third Party: A natural or legal person or an organisation without legal personality who is not the same as the data holder, processor or controller. The Company manages the range of personal data specified in the section on the persons involved in data management, the purpose and duration of data management.

Profiling: The Company does not use profiling data management.

The Company uses cookies on its website:

Under European Union law, we must ask for your consent to use cookies.



What are "cookies"?

Cookies are small, harmless files that your computer or browser stores when you visit a website. Cookies do not store personal information, do not damage your files, they only store information about your visit to the website.

What do we use cookies for?

We use cookies to make the website work as efficiently as possible. Cookies help us to identify returning users based on the data they store, so we can collect data about the behaviour of our users. We collect information that shows our users from which country, from which browser they visited our website, what operating system they use, what pages they view on our website and what features they use. Cookies do not collect personally identifiable information.

These cookies are provided by Google and are used through the Google Adwords system. These cookies are sent to the visitor's computer only when certain sub-pages are visited, so we only store the fact and time of the visit to the given sub-page, not any other information.

We use the data to analyse, optimise, develop and promote our website in order to provide you with the best possible service.

The use of cookies is as following:

These cookies are used by third-party service providers, including Google to store if the user has previously visited the advertiser's website, and based on this they display ads to the user on the websites of third-party service providers including Google. Users can disable Google cookies on the Google ads opt-out page. (You can also let users know that they can disable third-party cookies on the Network Advertising Initiative opt-out page.)

Cookies used:

- Analytics, tracking cookies
- Site tracking
- Login, user ID session cookie



The "Help" feature in the menu bar of most browsers provides information about the browser

- how to disable cookies,
- how to accept new cookies, or
- how to instruct your browser to set a new cookie, or
- how to turn off other cookies.

The Company does not collect personal information on its website.

Website operator and hosting provider: XTRADEDEVELOPERS Kft.
Adress: 1125 Budapest, Rózse u. 6-8. 3. épület 1/27.

I. Legal basis for data management

Data management is required for the performance of the contract or on the basis of legislation. The provision of data is voluntary, the data subject is not obliged to give his / her consent to the data management, however, he / she acknowledges that in the absence of the provision of data the Company cannot start or continue the business relationship with him.

II. The range of persons involved in the data processing and the purpose and duration of the data processing

The data management covers the data of all stakeholders - partners, customers, principals. The Company handles personal data only for the purpose (purpose of the data) in order to provide the services and payments specified in the assignment contract to the data subjects.

The Company manages the following data:

IN THE CASE OF AN AGREEMENT CONTRACT CONCERNING SALES / LEASE OF REAL ESTATE:



Surname and forename, name of birth, place and date of birth, type and ID number of identity documents, address, in case of a foreign citizen place of residence, mother's name, citizenship, tax number, personal ID number, email address, telephone number, topographical number of the regarding property, the name of the individual representing the contractor (+ email address, telephone number, ID number), name of individual representing the entrepreneur (+ email address, telephone number, ID number).

- **Purpose and reason of data management:** establishing and performing the contract and maintaining long-term contact
- **Duration of data management:** 8 years after the fulfilment of an ad hoc order (accounting retention)

FOR VIEWING PROPERTY:

Surname and forename, place and date of birth, address, e-mail address, telephone number, identity card number of the individual viewing the property.

- **Purpose and reason of data management:** Proving that by signing the property inspection statement the interested individual were aware of viewing the presented property with the help of M&D's.
- **Duration of data management:** For 5 years from the signing of the declaration or until revoked. In this case, the consent to the processing may not be withdrawn on the basis of the legitimate interest of the controller within one year of the signing of the declaration.

IN THE CASE OF A MESSAGE SENT THROUGH A WEBSITE:

Names, e-mail addresses and telephone numbers of individuals

- **Purpose and reason of data management:** Answering a question included in the sent message, fulfilling a request.
- **Duration of data management:** As long as the handling of the case requires or until withdrawn.



IN CASE OF REGISTRATION ON SOCIAL MEDIA INTERFACES:

(Facebook, YouTube, Instagram, Pinterest) The voluntarily registered name and public profile picture of the registered individuals who like the page.

- **Purpose and reason of data management:** Providing information for, and keeping in contact with all stakeholders who have voluntarily registered on social media sites and “Liked” the Company's’ profile page.
- **Duration of data management:** The data holder can find out about the source of the data, data handling, as well as the method and legal basis of the transfer on the given social media page. Data management is carried out on social media sites so the duration and method of data management as well as the possibilities of deleting and modifying data are regulated by the given social media site.

IN CASE OF COMPLAINT OR NOTIFICATION:

Name, address, type and number of ID card of the individual submitting the liability claim / complaint.

- **Purpose and reason of data management:** Adjudication of the claim / complaint on the basis of legal proceedings.
- **Duration of data management:** 5 years from the date of dispatch of the reply.

IN THE CASE OF ADMINISTRATION WITH AN AUTHORISED PERSON:

Personal data of proxies: The name, address, type and number of the ID card of a person acting on behalf of the person concerned in a matter related to the enterprise.

- **Purpose and reason of data management:** Managing the case of the data holder on the basis of voluntary consent.
- **Duration of data management:** 5 years from the completion of the case.

The provision of the data is a condition for the provision of the service provided by the Company in the contract, in the absence of their provision or in the case of a subsequent request for their deletion, the service cannot be used. The provision of other data is voluntary, the withdrawal of consent to data processing does not affect the legitimacy of previous data processing.



III. The range of data controllers

The employees / agents of Matthew & Daniel's Kft. Are considered to be persons entitled to data management.

IV. Data transmission, data processing

The Company will provide data in real estate matters (if the offer is accepted by the seller, to the document editing attorney). The Company also uses a data processor - an accountant to perform accounting tasks and in some cases a courier company if necessary.

V. Data holders data management rights

Right to information: At the request of the data holder the data controller is obliged to provide information of appropriate size, language, simple interpretable and easy to find information on the relevant aspects of data management (who, what, for what, how, when, for how long).

Right of access: The individual may request information on whether his or her data is being processed and if so, which data is being processed and how.

Right to rectification: The data holder may indicate that the data processed is inaccurate and request what should be indicated instead.

The right to forget: The data owner has the right to request the deletion of his / her personal data from the data controller, if the data controller is not prevented from deleting his / her data by other legal obligations and the basis of data processing has ceased to be deleted within a reasonable time, but not more than 25 days. If the controller has given third parties access to the data to be deleted, it must inform all those to whom it has disclosed the data in question, so that all references or personal data stored with them can be deleted.

Right to restrict data processing: In some cases, the person involved in the processing of personal data may request a restriction on the processing of his or her personal data, for example in an unclear, contentious situation or when data processing is no longer necessary but the data holder still wishes to do so.

Right to data portability: The data holder may request to receive the data processed concerning him or her in a structured, widely used "machine-readable" format and shall



have the right to transfer such data to another controller without being hindered by the original controller.

Right to objection: The data holder has the right to object at any time for reasons related to his or her own situation, to the processing of his or her personal data for a specific reason, in cases where the data subject has not consented to the processing of his or her data and is not justified by his or her legal obligations.

Right to withdraw consent: The data holder has the right to withdraw his or her consent at any time. Withdrawal of consent shall not affect the lawfulness of the data processing prior to withdrawal.

The data holder may request the exercise of his / her data rights orally, in writing, at a postal address, e-mail address, website - preferably through the forum which the data were lawfully transferred to the data controller.

VI. Complaint handling and legal remedy

If you have a complaint about the handling of your data, please contact us, preferably in writing, at the e-mail address (sales@matthewdanielsrealty.com). We will do our best to investigate your complaint as soon as possible, but within the maximum of 25 days.

Amennyiben ezt követően is fennáll a panasz, vagy eljárásunkkal nem elégedett, bírósághoz, vagy a Nemzeti Adatvédelmi és Információszabadság Hatósághoz fordulhat az alábbi elérhetőségeken:

If you still have a complaint or you are not satisfied with our procedure you can contact a court or the National Data Protection and Freedom of Information Authority at the following contact details:

Postal address: 15 Budapest, Pf:5.

Address: 1125 Budapest, Szilágyi Erzsébet fasor 22/c. Phone: +36 1 391 1400

Fax: +36 1 391 1410

Email: ugyfelszolgalat@naih.hu

URL: www.naih.hu

The circumstances and legal environment of data management may change, and the Company may at any time decide to supplement its ongoing data management with a



new data management purpose, therefore it reserves the right to amend this Prospectus at any time. The current information is available on the Company's website.