

Information on the processing of personal data by CPI Hungary Kft.

Introduction

The following information is provided by CPI Hungary Kft. (company registration number: 01-09-469614, registered office: 1139 Budapest, Váci út 99-105., Balance Hall, 6th floor; hereinafter referred to as "**the Company**") about the processing of your personal data by CPI Hungary Kft.) on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Regulation (EC) No 95/46/EC (hereinafter "**GDPR**") and related data protection legislation.

As the controller of your personal data, the Company determines the purposes and means of the processing of your personal data as set out below. You may also exercise the rights listed below in relation to the processing of your personal data in relation to the Company.

You may contact the Company in writing at Balance Hall, 6th floor, Váci út 99-105, 1139 Budapest, Hungary, by telephone at +36-1-225-6600 or by e-mail at hungary@cpipg.com.

Processing of your personal data

The Company will process your personal data only on the appropriate legal basis, to the extent and for the time necessary for the specific purpose.

Below you will find an overview of the purposes for which the Company processes your personal data, including a description of the purposes of the processing. Each purpose of processing includes information on the following at the same time:

- the legal basis on which your personal data is processed for that purpose;
- the purposes for which your personal data is processed, the purposes for which it is processed and the scope of the processing;
- the source of the personal data;
- information on who has access to your personal data;
- information about the period for which the Company will store your personal data.

Where the legal basis for the processing of your personal data is the legitimate interest of the Company or third parties, you will also be informed of the nature of that legitimate interest.

1. CPI Club registration

Purpose of data processing

CPI Club registration data management

Description of the purposes of the processing

The Company uses the <https://www.cpiclub.hu> domain (the "**Website**") for the purpose of providing information to all tenants who wish to register with the Company from companies belonging to the same group of companies with their registered office in Hungary and real estate in Budapest (the "**CPI Company**" or the "**CPI Companies**"; the Company and the CPI Companies together the "**CPI Group**") (the "**Tenants**" or "**Tenant**"), to create a common platform through which the Tenants' employees can more easily access and flexibly use the services provided by the CPI Group in the office buildings belonging to the CPI Group. The purpose of the Website is to make it easier for tenant-employees already registered on the Website, as users of the Website (individually the "**User**", collectively the "**Users**"), to access the amenities, office, conference and meeting room rental services they wish to use, and events organised by the Company (each a "**CPI Club Service**", collectively the "**CPI Club Services**"), and to communicate with the providers of the relevant CPI Club Service (the

"Providers") and Users regarding the related discounts. The CPI Club Services displayed on the Website are available only to Users (i.e., tenant employees already registered on the Website). Registration on the Site is free of charge. The Company will process the personal data provided by Users during registration for the purpose of enabling Users to use the Website and to access the CPI Club Services.

Legal basis

Voluntary, specific, informed and unambiguous consent of the data subject (Article 6(1)(a) GDPR) by filling in the fields of the registration form and by ticking the relevant box, accepting this privacy notice, thereby declaring that he or she has read this privacy notice, is familiar with it and accepts it. The registration cannot be completed if the User does not accept the checkbox referring to this Privacy Policy.

Category of personal data

To register on the Website, the User is required to provide a number of types of data, of which the following are personal data:

1. the CPI Club identification number;
2. first and last name;
3. e-mail address.

In addition to the above, during registration, the User is required to provide the following non-personal data: (i) the name of the office building to which the access card is valid; (ii) his/her gender; (iii) the business name of the Tenant; (iv) the position held by the Tenant.

Source of personal data

The User

Recipients of personal data

All departments of the Company involved in the operation of the Website.

CPI Facility Management Kft. (registered office: 1139 Budapest, Váci út 99-105, Balance Hall, 6th floor) is entitled to know the personal data of the data subject on behalf of the Company as the data processor responsible for the organisation of certain CPI Club Services.

Personal data of the data subject:

- (i) the Rendszerinformatika Zrt. (headquarters: 1134 Budapest, Váci út 19. IV: floor) on behalf of the Company as the data processor hosting the Website;
- (ii) Utazzitthon.hu Kft. (registered office: 2161 Csomád, Levente utca 14/A.) on behalf of the Company as the data processor hosting the Website;
- (iii) Qualysoft Zrt. (registered office: 1118 Budapest, Rétköz utca 5.) is entitled to know the data on behalf of the Company as the data processor operating the system storing the Users' personal data.

Storage period of personal data

5 years or until the withdrawal of the consent of the Users registering on the Website (whichever is the earlier)

2. Subscribe to the CPI Club newsletter

Purpose of data processing

Subscribe to the CPI Club newsletter

Description of the purposes of the processing

The Company has created the <https://www.cpiclub.hu> domain (the "**Website**") for the purpose of providing information to all tenants who wish to purchase real estate from companies belonging to the same group of companies as the Company, having their registered office in Hungary and real estate in Budapest (the "**CPI Company**" or the "**CPI Companies**"; the Company and the CPI Companies together the "**CPI Group**") (the "**Tenants**" or "**Tenant**"), to create a common platform through which the Tenants' employees can more easily access and flexibly use the services provided by the CPI Group in the office buildings belonging to the CPI Group. The purpose of the Website is to make it easier for Tenant Employees who are already registered on the Website, as users of the Website (individually, the "**User**", collectively, the "**Users**"), to access the amenities, office, conference and meeting room rental services that they wish to use, and events organised by the Company (each a "**CPI Club Service**", collectively the "**CPI Club Services**"), and to communicate with the providers of the relevant CPI Club Service (the "**Providers**") and Users regarding the related discounts. The CPI Club Services indicated on the Website are only available to Users (i.e. tenant employees already registered on the Website). Registration on the Website is free of charge. Users can subscribe to CPI Club Services newsletters either by ticking the appropriate box during registration or at a later date after registration. The Company will process the personal data provided by Users for the purpose of sending them newsletters about the CPI Club Services.

Legal basis

Voluntary, specific, informed and unambiguous consent of Users (Article 6(1)(a) GDPR) by subscribing to the Newsletter.

Category of personal data

Name, e-mail address of the Users.

 In addition to the above, during the registration, the User is required to provide the following data which are not personal data: (i) the designation of the office building to which the access card entitles him/her to access; (ii) the CPI Club identification number; (iii) his/her gender; (iv) the business name of the Tenant; (v) the position held with the Tenant.

Source of personal data

The Users

Recipients of personal data

All departments of the Company involved in the operation of the Website.

CPI Facility Management Kft. (registered office: 1139 Budapest, Váci út 99-105, Balance Hall, 6th floor) is entitled to know the personal data of the data subject on behalf of the Company as the data processor responsible for the organisation of certain CPI Club Services.

The personal data of the data subject:

- (i) Rendszerinformatika Zrt. (headquarters: 1134 Budapest, Váci út 19. IV: floor) on behalf of the Company as the data processor hosting the Website;
- (ii) Utazitthon.hu Kft. (registered office: 2161 Csomád, Levente utca 14/A.) on behalf of the Company as the data processor hosting the Website;
- (iii) Qualysoft Zrt. (registered office: 1118 Budapest, Rétköz utca 5.) is entitled to know the personal data of the Users on behalf of the Company as the data processor of the system storing the Users' personal data.

Storage period of personal data

5 years or until Users' consent is withdrawn (whichever comes first)

3. Processing of data relating to office, conference and meeting room rentals

Purpose of data processing

Processing of data relating to office, conference and meeting room rentals

Description of the purposes of the processing

The Company is available at <https://www.cpigroup.hu/cpiclub> domain (the "**Website**") for the purpose of providing tenants who wish to rent real estate in Budapest from companies belonging to the same group of companies as the Company, having their registered office in Hungary and real estate in Budapest (the "**CPI Company**" or the "**CPI Companies**"; the Company and the CPI Companies together the "**CPI Group**") (the "**Tenants**" or "**Tenant**"), to create a common platform through which the Tenants' employees can more easily access and flexibly use the services provided by the CPI Group in the office buildings belonging to the CPI Group. The purpose of the Website is to make it easier for Tenant Employees who are already registered on the Website, as users of the Website (individually, the "**Users**", collectively, the "**Users**"), to access the amenities, office, conference and meeting room rental services that they wish to use, and events organised by the Company (each a "CPI Club Service", collectively the "**CPI Club Services**"), and to communicate with the providers of the relevant CPI Club Service (the "**Providers**") and Users regarding the related discounts. The CPI Club Services indicated on the Website are only available to Users (i.e. tenant employees already registered on the Website).

Registration on the Website is free of charge. After registration, Users can use the CPI Club Services to rent offices, conference rooms and meeting rooms in the CPI Group or in an operator/owner in cooperation with the CPI Group, subject to availability in the office building selected by the User. The User shall specify the location and time of his choice and send it to the Company via the Website. The Company will then contact the User and either confirm the requested location and time (thus the booking) or inform the User that the requested location is not available at the time specified. If the User is successful in renting an office, conference or meeting room through the Company, both in terms of location and time, a rental agreement will be concluded between the User and the company entitled to use the space in question, which will be concluded separately between the parties concerned.

Legal basis	Data processing necessary to facilitate the conclusion of a rental contract between Users and the person entitled to use the office, conference room or meeting room in question (Article 6(1)(b) GDPR).
Category of personal data	<p>Users' names, e-mail addresses, telephone numbers (if provided by the User).</p> <p>In addition to the above, during registration, the User is required to provide the following data which are not personal data: (i) the designation of the office building to which the access card gives access; (ii) the CPI Club identification number; (iii) the gender; (iv) the business name of the Tenant; (v) the position held with the Tenant.</p>
Source of personal data	The Users
Recipients of personal data	<p>All departments of the Company involved in the operation of the Website.</p> <p>The Company will transfer the personal data of the data subject to the CPI Company authorised to use the relevant office, conference or meeting room.</p> <p>The CPI Facility Management Ltd. (registered office: 1139 Budapest, Váci út 99-105, Balance Hall, 6th floor) is entitled to know the personal data of the data subject on behalf of the Company as the data processor responsible for the organisation of certain CPI Club Services.</p> <p>The personal data of the data subject:</p> <ul style="list-style-type: none">(i) Rendszerinformatika Zrt. (headquarters: 1134 Budapest, Váci út 19. IV: floor) on behalf of the Company as the data processor hosting the Website;(ii) Utazitthon.hu Kft. (registered office: 2161 Csomád, Levente utca 14/A.) on behalf of the Company as the data processor hosting the Website;

- (iii) Qualysoft Zrt. (registered office: 1118 Budapest, Rétköz utca 5.) is entitled to know the data on behalf of the Company as the data processor operating the system storing the Users' personal data.

The personal data of the person concerned will be transferred to the company authorised to use the office or conference or meeting room in order to conclude a rental contract between the User and the company entitled to use the room. The details of the company entitled to use the room in question can be found on the data sheet of the office booking.

Storage period of personal data	Until the expiry of the lease of the office, conference or meeting room in question or for 5 years (whichever is the earlier).
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Transfer of your personal data to third countries or international organisations

The Company or the recipients to whom the Company grants access to your personal data for the purposes listed above will not transfer your personal data to third countries or international organisations.

Automated decision-making

An automated decision is a decision made by the Company or by a recipient to whom the Company provides access to your personal data for the purposes set out above, which is based solely on the automated processing of your personal data (including profiling) and which produces legal effects concerning you or similarly significantly affects you.

The Company or recipients to whom the Company provides access to your personal data for the purposes listed above will not use your personal data for automated decision-making.

What are your rights regarding data processing?

In relation to your personal data processed by the Company, you may request the Company to:

- Provide you with access to your personal data; in particular, you may be informed whether your data are processed, if so, for what purposes, which data are processed and, where relevant, who has access to your personal data. You may also receive a copy of your personal data processed;
- correct inaccurate data or complete incomplete personal data;
- erase personal data, for example, if the purpose of the processing has ceased or if the processing of your personal data has been unlawful;
- restrict the processing of your personal data;
- provide a data portability facility whereby you can obtain, for yourself or another controller, data relating to you which you have previously provided to the Company in a structured and machine-readable format;
- declare that you are not subject to any decision based on automated processing (you may have already been informed in the previous Chapter whether such a decision will be taken).

You may also object to the processing of your personal data if the processing is based on a legitimate interest or lodge a complaint with the Data Protection Office. The contact details are:

National Authority for Data Protection and Freedom of Information

1055 Budapest, Falk Miksa utca 9-11.

1363 Budapest, PO Box 9.

Tel.: +36-1-391-1400

www.naih.hu

ugyfelszolgalat@naih.hu

How can you exercise your rights?

You can exercise your rights by making a written or oral request. In order to ensure adequate protection of the personal data processed by the Company and to avoid any misuse of the data, the Company has established the following rules to verify your identity.

You may exercise your rights in one of the following two ways:

By written request

To request the exercise of your right, please fill in the application form available here: www.cpigroup.hu/pdf/gdpr_hu.pdf?v071(CPI Property Group Group Group Privacy Policy Appendix 2). Depending on local legislation, you can have your signature notarised, e.g. at a notary, post office, lawyer, consulate or municipal/regional authority. The signature must be authenticated in the country in which you are submitting the application to the relevant CPIPG company in person (e.g. at a hotel, office or other premises designated by the Company) or by post using a postal service. If the application is posted by a postal service provider outside the EEA or the European Union, you may be contacted by the Company for further verification of your identity.

Oral request

You may request the exercise of a specific right in person at the registered office of the Company. Your identity will be verified (e.g. at the reception) by a designated Company employee on presentation of one of the following personal documents: identity card, passport or other facial identification that can clearly identify you.

The exercise of your rights does not affect the rights of third parties.

Please note that where your requests are manifestly unfounded or excessive, in particular because of their repetitive nature, the Company may charge a reasonable fee to respond to your request, which may not exceed the cost of providing the information or ensuring the exercise of your rights.

Do you have to provide your personal data?

If the Company processes your personal data on the basis of your consent, the processing of this data is voluntary. In this case, you are not obliged to give your consent or to provide the Company with your personal data.

Your consent to the processing of your personal data is a voluntary, specific, informed and unambiguous expression of your will, by which you give your consent, by means of a declaration or other clear affirmation, to the processing of personal data concerning you.

The Company may process your data on various legal grounds, e.g. for the performance of a contract, to comply with a legal obligation or on the basis of legitimate interest. In such a case, the processing of your personal data is necessary for the Company to, for example, enter into a contract with you or to comply with a legal obligation. If you choose not to provide your personal data to the Company, it would not be possible to enter into a contract or fulfil a legal obligation.

How and when can you withdraw your consent to the processing of your personal data?

You may withdraw your consent to the Company at any time, even before the end of the period for which you have given your consent.

You may withdraw your consent:

- Electronically, by sending an e-mail to hungary@cpipg.com; or
- In writing to the following address:

1139 Budapest, Váci út 99-105., Balance Hall, 6th floor.

The withdrawal of your consent does not affect the processing of your personal data prior to the withdrawal.