

DATA PROTECTION AND DATA PROCESSING
PRIVACY NOTICE

Lurdy-Ház Bevásárló- és Irodacentrum Korlátolt Felelősségű Társaság

(Lurdy-Ház Shopping and Office Centre Limited Liability Company)

(1097 Budapest, Könyves Kálmán krt. 12-14.)

Budapest, 25 March 2026

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I. INTRODUCTION OF THE DATA CONTROLLER

Lurdy-Ház Bevásárló- és Irodacentrum Korlátolt Felelősségű Társaság (hereinafter: "**Company**", "**Data Controller**") has drawn up this privacy notice to ensure the lawfulness of its internal data processing operations and to safeguard the rights of Data Subjects.

Name of the Data Controller:	Lurdy-Ház Bevásárló- és Irodacentrum Korlátolt Felelősségű Társaság
Company registration number of the Data Controller:	01-09-566490
Registered seat of the Data Controller:	1097 Budapest, Könyves Kálmán krt. 12-14.
E-mail address of the Data Controller:	adatvedelem@lurdyhaz.hu
Representative of the Data Controller:	Szilágyi Csaba József, managing director and Török Ákos, company director

Our Company processes personal data in accordance with all applicable legislation, in particular the following:

- Act CXII of 2011 on the Right to Informational Self-Determination and the Freedom of Information (2011. évi CXII. törvény) (hereinafter: Infotv.),
- Regulation (EU) 2016/679 of the European Parliament and of the Council on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation; hereinafter: the Regulation).

Our Company treats personal data confidentially and takes all technical and organisational measures related to data storage and data processing to facilitate the secure processing of data in order to preserve such data.

Definitions

The definitions used in this notice correspond to the interpretive definitions set out in Article 4 of the Regulation and, in certain respects, are supplemented by the interpretive provisions of Section 3 of the Infotv.

Where this notice refers to data or data processing, personal data and the processing thereof shall be understood.

II. CHARACTERISTICS OF INDIVIDUAL DATA PROCESSING PURPOSES

In the course of its activities, particularly in connection with the services of the Lurdy Shopping, Office and Event Centre located at 1097 Budapest, Könyves Kálmán krt. 12-14. (hereinafter: "**Lurdy Shopping Centre**"), operated by the Data Controller, various data processing activities arise, about which the Data Controller informs Data Subjects by means of this notice.

1. Management of cookies on the website

The Data Controller operates several websites in connection with its activities and services. These are available at the following addresses:

- [https://lurdyhaz.hu/;](https://lurdyhaz.hu/)
- <https://www.lurdyvip.hu/>

[hereinafter collectively: "**website(s)**"].

Our Company uses so-called cookies on its websites to maintain and develop the services of the website and to enhance the user experience.

What is a cookie?

Cookies are small text-based identification and information-gathering files placed on the user's device by the browser. A cookie consists of a unique numerical sequence and primarily serves to distinguish between computers and other devices that download the web page. Cookies have various functions, including collecting information, remembering user preferences, and enabling the website owner to learn about user habits in order to enhance the user experience.

For what purposes may we use cookies?

- ensuring the proper and high-quality functioning of the website,
- measuring traffic,
- preparing web analytics and analysing how visitors use the website,
- verifying and improving the quality of services provided by the website,
- enhancing the user experience,
- facilitating the management of our pages,
- optimising the relevance of advertisements displayed on the website,
- tracking and measuring the performance of advertisements.

What cookies does the website use?

Detailed information about the cookies used by the website is provided through the website's cookie manager; however, the following types of cookies are generally used.

Strictly necessary, session cookies

These cookies are necessary for users to use the functions of our website without interruption; through these cookies, we can ensure, among other things, that the actions performed on the pages viewed by users are remembered during a single visit.

The validity period of these cookies applies only to the Data Subject's current visit; these cookies are automatically deleted from the computer upon the end of the session or when the browser is closed.

Statistical, "performance" and advertising cookies

These are non-essential cookies that help improve the user experience and execute certain functions of the website, analyse the use of the website (e.g. which pages users viewed, which links they clicked on), and display targeted advertisements. The Data Controller uses these only on the basis of the users' consent.

For performance measurement purposes, our website, with the user's consent, also uses third-party cookies to track how many people visit the website and what content they are interested in. All

information is stored anonymously and used to ensure a high-quality experience for users while browsing the website.

Our website uses the **Google Analytics** service for performance measurement. Furthermore, for the <https://lurdyhaz.hu> website, the Data Controller uses the **Google Ads** service for tracking and measuring advertisement performance. Data Subjects can find the privacy notice regarding the settings and use of Google Analytics and Google Ads on Google's website: <https://policies.google.com/privacy?hl=hu>.

Information collected by cookies is not sold or leased by the website to third parties, except to the extent necessary for the provision of services for which the Data Subject has previously and voluntarily provided such information.

What is the legal basis for data processing through cookies?

We use cookies indispensable for the use of the website on the basis of our legitimate interest under Article 6(1)(f) of the GDPR; the legal basis for the use of other cookies is the Data Subject's consent, which can be given through the cookie manager. The legal basis for data processing through the use of other cookies is the Data Subject's consent, i.e. Article 6(1)(a) of the GDPR. Data Subjects may accept or reject the use of these cookies using the so-called cookie manager pop-up that appears on the homepage when they first visit the website; in the latter case, the cookies are not installed and do not collect data about the Data Subject.

How can you check and disable cookies?

In addition to the website's cookie manager, every modern browser allows cookies settings to be changed. Most browsers accept cookies automatically by default, but these can generally be changed to prevent automatic acceptance and offer a choice each time as to whether or not to allow cookies.

Since the purpose of cookies is to facilitate or enable the usability and processes of the website, preventing or deleting the use of cookies may result in users being unable to fully use the website's functions, or the website may function differently from what was intended in their browser.

You can find information about cookie settings for the most popular browsers at the following links:

Google Chrome:

<https://support.google.com/accounts/answer/61416>

Firefox:

<https://support.mozilla.org/hu/kb/sutik-informacio-amelyet-weboldalak-tarolnak-szami>

Microsoft Edge:

<https://support.microsoft.com/hu-hu/help/4468242/microsoft-edge-browsing-data-and-privacy>

Microsoft Internet Explorer:

<https://support.microsoft.com/hu-hu/help/17442/windows-internet-explorer-delete-manage-cookies>

Opera:

<https://help.opera.com/en/latest/web-preferences/#cookies>

Safari:

<https://support.apple.com/hu-hu/guide/safari/sfri11471/mac>

2. Data processing related to social media platforms

In today's online world, social media platforms are the most important channels of communication. In addition to its websites, the Data Controller wishes to report on current information, events and news related to its operations and services through its social media pages. These pages enable more direct contact with those interested and allow information published by the Data Controller to reach a wider readership and audience.

The Data Controller currently uses the following pages and channels:

- Facebook page: <https://www.facebook.com/lurdybudapest> (hereinafter: **Facebook Page**);
- Instagram page: <https://www.instagram.com/lurdybudapest/> (hereinafter: **Instagram Page**);
- TikTok channel: <https://www.tiktok.com/@lurdyhaz> (hereinafter: **TikTok Channel**);
- LinkedIn page: <https://hu.linkedin.com/company/lurdy> (hereinafter: **LinkedIn Page**)

(hereinafter collectively: **Social Media Pages** or **Social Media Page**).

Purpose of data processing

The purpose of processing personal data is to operate the Social Media Pages and thereby inform those interested about current information, news and events related to the Data Controller's operations and services.

The purpose of operating the Social Media Pages is also to enable those interested to express opinions and reactions regarding information published on the Social Media Pages, to ask questions and make observations in relation thereto, to write reviews in respect of the Facebook Page, and to contact the Data Controller via private message in relation to the Facebook Page (Messenger), Instagram Page and TikTok Channel.

The Data Controller is entitled to moderate content that violates the terms of use of the Social Media Page or of the social media platform in general (i.e. to delete such content from the Social Media Page), and, where necessary, to ban persons who regularly and/or seriously violate such terms of use from the Social Media Page; accordingly, a further purpose of data processing is to moderate such offensive content and to ban Data Subjects engaging in such activities from the Social Media Page.

The operator of the Social Media Page (see in detail below) provides the Data Controller with the data of the page insights function (hereinafter collectively: **Page Insights**). The Page Insights function displays aggregated data, the purpose of which is to help the Data Controller understand how visitors use the Social Media Pages.

The Data Controller reserves the right to organise promotions (e.g. prize draws) on the Social Media Page. With regard to such promotional activities and the data processing carried out in connection therewith, the Data Controller issues separate privacy notice(s).

The Data Controller does not maintain any record outside the Social Media Page of the Data Subjects of the data processing activities carried out on the Social Media Pages or of the activities carried out by them on the Social Media Page, does not process the personal data published by Data Subjects on

the Social Media Page in any other way or on any other platform beyond the above, and does not, in general, use the Data Subjects' personal data for any purpose other than those described above.

Personal data processed

The Data Controller processes personal data on the Social Media Pages in the following cases:

- following the Social Media Page / subscribing to the Social Media Page / joining the Social Media Page, or unfollowing / unsubscribing / leaving: public data relating to the Data Subject's profile (profile name, profile user ID);
- activities carried out on or in connection with the Social Media Page: data relating to the activity, including writing a post, writing a review, sharing a post, commenting on a post, reacting to a post (e.g. liking a post);
- initiating communication via private message with the Social Media Page: all information that the Data Subject brings to our attention in the course of the communication;
- in the event of a breach of the terms of use of the Social Media Page or of the social media platform in general, for the purpose of moderating the infringing content and banning/blocking the Data Subject from the Social Media Page: data relating to such infringing conduct and public data relating to the Data Subject's profile (profile name, profile user ID).

Personal data processed in connection with the Page Insights function:

The Page Insights function may be based on personal data collected by the operator of the Social Media Page about Data Subjects who visit or use the Social Media Page and its content. The range of personal data used for these Page Insights is determined by the operator of the Social Media Page, and only the operator can see and process such data. The Data Controller has no influence over the scope of these personal data, cannot influence them in any way, and has no influence over the data processing of the Social Media Page. During the use of the Page Insights function, the Social Media Page displays the information to us only in aggregated form, as statistics, not in an individualised manner; therefore, we do not process personal data in connection with the Page Insights.

Legal basis for data processing

Pursuant to Article 6(1)(f) of the Regulation, the legitimate interest of the Data Controller to reach the visitors of Lurdy Shopping Centre and those interested in its services more directly through the operation of Social Media Pages, and to inform them even more effectively about current news and events relating to its services.

Source of personal data

The Data Subject and the Social Media Page.

Access to personal data

The Data Controller makes the Data Subject's personal data available only to those of its employees whose duties include the management and operation of the Social Media Page.

Absolute Done Kft. (registered seat: 1095 Budapest, Gát utca 21. Fsz. 1. ajtó) and **ESD Content Kft.** (registered seat: 1068 Budapest, Király utca 110. 1. em. 6.) also participate in the management of the Social Media Pages and, as Data Processors, have access to personal data related to the operation of the Social Media Pages.

The Data Processor may only process personal data for the purpose determined by the Data Controller and set out in the contract, in accordance with its instructions, and has no independent decision-making power with regard to data processing. The Data Processor has assumed confidentiality obligations and contractual guarantees regarding the preservation of personal data it becomes aware of while performing its duties.

The Data Subject's personal data — with the exception of personal data provided in private messages — are data that the Data Subject publishes on the public interface of the Social Media Page and are therefore accessible to anyone. The Data Controller has no influence over exactly who will become aware of the data made public on the internet.

Personal data relating to the Social Media Page displayed in the Data Subject's own profile (e.g. a post published on the Facebook Page or following the Instagram Page) may be accessed, in accordance with the Data Subject's user settings, by all those who otherwise have access to similar data published by the Data Subject on the social media platform. The circle of persons entitled to access (e.g. that only friends or followers may see the published data) is set by the Data Subject.

Personal data contained in private messages are known only to the Data Controller.

Transfer of personal data to a third country or international organisation

The Data Controller does not transfer the Data Subject's personal data referred to above to any third country or international organisation; however, due to the borderless nature of the internet, personal data published by the Data Subject on the public interfaces of the Social Media Page (e.g. during comments or reviews) may be accessed by anyone who visits the Social Media Page.

Duration of personal data processing

The Data Controller processes personal data for as long as it is the administrator of the Social Media Page. The Data Controller has no influence over how long the operator of the Social Media Page displays the data.

Automated decision-making and profiling

Neither takes place during data processing.

1. Facebook

Meta Platforms Ireland Limited (4 Grand Canal Square, Grand Canal Harbour, Dublin 2 Ireland; hereinafter: **Meta Ireland**), as an independent data controller, collects data about persons visiting social media pages, groups or events in accordance with its own data processing policy.

Meta Ireland's general privacy notice is available at: [https://hu-facebook.com/privacy/explanation](https://hu.facebook.com/privacy/explanation).

For data protection inquiries, Meta Ireland's Data Protection Officer can be contacted at: <https://www.facebook.com/help/contact/540977946302970>.

Facebook Page

The Facebook Page is a public platform; therefore, the personal data published by the Data Subject there can be accessed by anyone, even without Facebook registration. Only Facebook users may

send reactions and comments to our content published on the Facebook Page, write reviews, and follow the Facebook Page. Facebook registration is required to send a message.

As administrator of the Facebook Page, the Data Controller reserves the right to moderate any reviews or comments published on the Facebook Page that it considers to violate the terms of use of Facebook or the Facebook Page (e.g. violent, sexual content), i.e. to delete such reviews and comments, and to ban persons who regularly and/or seriously violate the terms of use from the Facebook Page.

Information on joint controllership

In relation to the Facebook Page, Meta Ireland provides the Data Controller with the data of the Page Insights function. When processing personal data used for the preparation of Page Insights — having regard to the judgment of the Court of Justice of the European Union in Case C-210/16 — the Data Controller and Meta Ireland act as joint controllers under Article 26 of the Regulation.

Article 26 of the Regulation permits joint controllership. Where two or more controllers jointly determine the purposes and means of processing, they shall be joint controllers.

The joint controllers determine, in a transparent manner, by means of an arrangement between them, their respective responsibilities for compliance with the obligations under the Regulation, in particular as regards the exercising of the rights of the Data Subject and their respective duties to provide the information. The arrangement is the Page Insights controller addendum, available here: https://hu-hu.facebook.com/legal/terms/page_controller_addendum.

The Data Subject may exercise their rights under the Regulation in respect of and against each of the controllers, irrespective of the terms of the arrangement.

During joint controllership, all controllers comply with the rules on data protection and the processing of personal data.

Further information on data processing during the Page Insights is available here: https://www.facebook.com/legal/terms/information_about_page_insights_data.

2. Instagram

Meta Ireland, as an independent data controller, collects data about persons visiting individual Instagram profiles in accordance with its own data processing policy.

Meta Ireland's general privacy notice relating to Instagram is available at: <https://privacycenter.instagram.com/policy/>.

For data protection inquiries, Meta Ireland's Data Protection Officer can be contacted at: <https://www.facebook.com/help/contact/540977946302970>.

The Instagram Page may be visited by anyone; our photographs and videos published there may be viewed by anyone. Only users with an Instagram account can like our content published on the Instagram Page, comment on it, view content published in "stories", send us private messages, or follow the Instagram Page. Comments made by the Data Subject on the content of the Instagram Page and the followers of the Instagram Page can only be viewed by users with an Instagram account.

The Data Controller reserves the right to moderate any comments published on the Instagram Page that it considers to violate the terms of use of Instagram or the Instagram Page (e.g. violent, sexual content), i.e. to delete such comments, and to block persons who regularly and/or seriously violate the terms of use.

Information on joint controllership

In relation to the Instagram Page, Meta Ireland provides the Data Controller with the data of the Page Insights function. Given that Instagram qualifies as a Meta product, when processing personal data used for the preparation of Page Insights relating to the Instagram Page — having regard to the judgment of the Court of Justice of the European Union in Case C-210/16 — the Data Controller and Meta Ireland act as joint controllers under Article 26 of the Regulation.

Article 26 of the Regulation permits joint controllership. Where two or more controllers jointly determine the purposes and means of processing, they shall be joint controllers.

The joint controllers determine, in a transparent manner, by means of an arrangement between them, their respective responsibilities for compliance with the obligations under the Regulation, in particular as regards the exercising of the rights of the Data Subject and their respective duties to provide the information. The arrangement is the Page Insights controller addendum, available here: https://hu-hu.facebook.com/legal/terms/page_controller_addendum.

The Data Subject may exercise their rights under the Regulation in respect of and against each of the controllers, irrespective of the terms of the arrangement.

During joint controllership, all controllers comply with the rules on data protection and the processing of personal data.

Further information on data processing during the Page Insights is available here: https://www.facebook.com/legal/terms/information_about_page_insights_data.

3. TikTok

TikTok Technology Limited (10 Earlsfort Terrace, Dublin, D02 T380, Ireland; hereinafter: **TikTok Ireland**), as an independent data controller, collects data about persons visiting individual TikTok profiles in accordance with its own data processing policy. In connection with the processing of personal data for the technical operation of the TikTok platform, TikTok Ireland acts as a joint controller with TikTok Information Technologies UK Limited (WeWork, 125 Kingsway, London, WC2B 6NH, United Kingdom).

TikTok Ireland's general privacy notice is available at: <https://www.tiktok.com/legal/privacy-policy?lang=en#privacy-eea>.

For data protection inquiries, the Data Protection Officer can be contacted at: <https://www.tiktok.com/legal/report/privacy?lang=en>.

The TikTok Channel may be visited by anyone; our videos published there may be viewed by anyone. Only users with a TikTok account can like our content published on the TikTok Channel, comment on it, share it, send us private messages, or follow the TikTok Channel. Comments made by the Data Subject on the content of the TikTok Channel and the followers of the TikTok Channel can only be viewed by users with a TikTok account.

The Data Controller reserves the right to moderate any comments published on the TikTok Channel that it considers to violate the terms of use of TikTok or the TikTok Channel (e.g. violent, sexual content), i.e. to delete such comments, and to block persons who regularly and/or seriously violate the terms of use.

4. LinkedIn

LinkedIn Ireland Unlimited Company (Gardner House, Wilton Plaza, Wilton Place, Dublin 2, Ireland; hereinafter: LinkedIn Ireland), as an independent data controller, collects data about persons who interact in the LinkedIn Group or on the LinkedIn Page, or submit job applications, in accordance with its own data processing policy.

LinkedIn Ireland's general privacy notice is available at: <https://www.linkedin.com/legal/privacy-policy?src=li-other&veh=www.linkedin.com#use>.

The LinkedIn Page may be visited by anyone; our content and job advertisements published there may be viewed by anyone. Only users with a LinkedIn account can like our content published on the LinkedIn Page, comment on it, share it, send us private messages, apply for positions advertised by us, or follow the LinkedIn Page. Comments made by the Data Subject on the content of the LinkedIn Page and the followers of the LinkedIn Page can only be viewed by users with a LinkedIn account.

The Data Controller reserves the right to moderate any comments published on the LinkedIn Page that it considers to violate the terms of use of LinkedIn or the LinkedIn Page (e.g. violent, sexual content), i.e. to delete such comments, and to block persons who regularly and/or seriously violate the terms of use.

3. Data processing related to communication

In today's fast-paced world, our Company maintains contact with its partners, users of its services, and persons interested in its services primarily by electronic means. At the same time, anyone may also contact the Company by telephone or by post with their questions.

Anyone may contact our Company directly by e-mail, by telephone, or by post, whether for requesting information, requesting a quotation, technical questions, or any other matter. In connection with such enquiries, our Company processes the personal data of the person initiating the enquiry in order to answer the question raised, provide a quotation, etc.

Purpose of data processing

Communication between the Company and the Data Subject. We process the data provided by the Data Subject solely for the purpose of communication with them and handling the matters contained in their letter or message.

Personal data processed

Name, postal address, e-mail address, and any other information that the Data Subject considers relevant to the matter they have initiated.

Legal basis for data processing

The legal basis for processing personal data is the legitimate interest of the Data Controller under Article 6(1)(f) of the Regulation, namely to process the personal data necessary to respond to an enquiry when contacted regarding any matter.

Source of personal data

The source of personal data is the Data Subject.

Access to personal data

Personal data are processed only by those employees of our Company whose duties include this task.

The Data Controller's e-mail service provider acts as a Data Processor in connection with the services related to the operation of the e-mail system. The Data Controller's e-mail provider is **Microsoft Ireland Operations Ltd.** (registered seat: One Microsoft Place, South County Business Park Leopardstown Dublin 18, D18 P521 Ireland), the operator of the Microsoft Outlook application.

Transfer of personal data to a third country or international organisation

The Company does not transfer personal data to any third country or international organisation.

Duration of personal data processing

The Data Controller processes personal data that come to its knowledge in the course of communication until the final conclusion of such communication. If any kind of contract (obligation) is concluded between the Data Controller and the Data Subject, the Data Controller processes the personal data that come to its knowledge in the course of communication in connection with the relevant contract, in accordance with Section II.4 of this notice regarding the performance of contracts.

Automated decision-making and profiling

Neither takes place during data processing.

Consequences of failure to provide personal data

The processing of personal data is a condition for replying to the letter or message and thus for communication between the Data Subject and our Company.

4. Data processing related to the performance of lease agreements, contracts related to the organisation of events, and other contracts; processing of contact persons' data

In the course of providing its services and in connection therewith, our Company may enter into contracts — in particular lease agreements, but also, for example, agency or works contracts — with other legal entities, which may be natural persons or legal persons.

In this regard, it should be noted that Lurdy Shopping Centre has an extensive event centre consisting of several halls and a space suitable for holding exhibitions. The halls of the event centre may be rented by anyone for the purpose of holding an event, for which the Data Controller — upon request — also provides supplementary services, including in particular the following: catering, event technology equipment, security services, cloakroom. In the context of room rental and the provision of supplementary services, the Data Controller also enters into contracts with natural or legal persons requesting a quotation for room rental.

In the event that our Company enters into a contract with a natural person or sole proprietor, it processes the personal data necessary for identifying such person and maintaining contact with them, as well as other personal data related to the performance of the contract.

Where our Company enters into a contract with a legal person, it is necessary to process the data of the partner's contact person in order for the parties to maintain contact with each other during the cooperation, and for the purpose of maintaining and deepening the ongoing cooperation.

Purpose of data processing

The purpose of data processing is the conclusion and performance of the contract entered into between the Company and the contracting partner, including contact-keeping in connection with the contract, and thereby establishing and maintaining a business relationship.

Personal data processed

Given that a sole proprietor qualifies as a natural person, in the case of entering into a contract with a sole proprietor or a natural person, the source of the personal data is the Data Subject, and our Company provides final information regarding the precise scope of personal data processed at the time the contract is concluded.

In general, in the case of a natural person or sole proprietor contracting party, the following data may be processed, noting that the final scope of data processed can be ascertained from the specific contract:

- a) name (identification),
- b) mother's name (identification),
- c) place and date of birth (identification),
- d) home address / in the case of a sole proprietor, registered seat (contact),
- e) telephone number (contact),
- f) e-mail (contact),
- g) in the case of payment by bank transfer: bank account number, name of the account-keeping bank,
- h) where the fee is paid after deduction of public charges, processing of the social security number (TAJ szám) is necessary,
- i) in the case of onerous contracts: tax identification number; in the case of a sole proprietor: tax number,
- j) in the case of a sole proprietor: registration number,
- k) other data strictly necessary for the performance of the contract (e.g. in the case of a lease agreement, data relating to the amount of the rent and its payment; in the case of room rental, data relating to the relevant requirements).

In the case of a legal person, our Company may process the name, telephone number, e-mail address and position of the representative and the contact person.

In the case of the provision of catering services, the party requesting such services may indicate special dietary requirements arising from food sensitivity or food allergies. However, no processing of personal data takes place in this regard, not even in the case of a private event.

The Data Controller sends information related to the lease agreement, including information on operation, maintenance and events, to tenants and their contact persons by e-mail.

Legal basis for data processing

In the case of a natural person, the legal basis for data processing is Article 6(1)(b) of the Regulation, i.e. the performance of a contract concluded with the Data Subject.

Where the contact person is not in a direct contractual relationship with our Company, i.e. the Data Subject is an employee or other agent of the contracting partner, the legal basis for data processing is the legitimate interest of our Company under Article 6(1)(f) of the Regulation. Our Company's legitimate interest is establishing and maintaining a business relationship with the company represented by the Data Subject, for the most effective performance of the contract concluded. Contact-keeping is therefore necessary for the establishment of economic cooperation and for the performance of the contract(s) concluded between the organisations. Our Company does not process the Data Subject's personal data for any other purpose without a legal basis.

The legal basis for data processing regarding the sending of information related to the tenancy to tenants and their contact persons is likewise the legitimate interest of the Data Controller to ensure that the most important information related to the tenancy reaches the tenants. The Data Controller does not use these e-mail addresses for sending any other types of e-mail, such as marketing e-mails.

Where the processing of personal data of natural persons other than the contracting party is necessary in connection with the conduct of an event, the legal basis for this is the legitimate interest of our Company under Article 6(1)(f) of the Regulation, namely its interest in successfully holding the events it organises.

Source of personal data

Where our Company contracts with a natural person or sole proprietor, the source of personal data is the contracting party. In the case of contracting with a legal person, the source of the contact person's data is the contracting legal person.

Access to personal data

Personal data are processed only by those employees of our Company whose duties include this task.

For the sending of general informational e-mails containing information related to the tenancy to tenants and their contact persons, the Data Controller uses the MailChimp service, the operator of which is **The Rocket Science Group LLC d/b/a Mailchimp** (675 Ponce de Leon Ave NE Suite 5000 Atlanta, GA 30308, United States of America), which qualifies as a Data Processor.

The Data Processor may only process the Data Subject's personal data for the purpose determined by the Data Controller and set out in the contract, in accordance with the Data Controller's instructions, and has no independent decision-making power with regard to data processing. The Data Processor has assumed confidentiality obligations and contractual guarantees regarding the preservation of personal data it becomes aware of while performing its duties.

Transfer of personal data to a third country or international organisation

The Company does not transfer personal data to any third country or international organisation.

Duration of personal data processing

Our Company processes the personal data of Data Subjects for the duration of the general limitation period set out in the Civil Code following the performance of the contract, noting that where the contract qualifies as an accounting document directly or indirectly supporting the bookkeeping entries, our Company is required to retain it in a legible form, retrievable on the basis of the references in the accounting records, for at least 8 years, pursuant to Section 169(2) of Act C of 2000 on Accounting (2000. évi C. törvény).

Our Company ceases to process the contact person's data for the contact-keeping purpose specified in this section upon receipt of information that the contact person's employment relationship with the contracting partner has been terminated.

Our Company processes data related to the organisation of events for the 5-year general limitation period following the conduct of the event.

Automated decision-making and profiling

Neither takes place during data processing.

Consequences of failure to provide personal data

The provision of personal data is indispensable for the conclusion and performance of the contract.

5. Issuance and retention of invoices

Purpose of data processing

The purpose of our Company's data processing is the issuance and retention of invoices in accordance with:

- Section 159(1) and Section 169 of Act CXXVII of 2007 on Value Added Tax (2007. évi CXXVII. törvény; hereinafter: VAT Act), and
- Section 169(2) of Act C of 2000 on Accounting (2000. évi C. törvény).

Personal data processed

Our Company's clients may be legal persons, as well as natural persons and sole proprietors. In the latter case, the following data qualify as personal data, and we process them as follows.

Data specified in Section 169 of the VAT Act, but in the case of a natural person at least:

- a) name,
- b) billing address.

Legal basis for data processing

The legal basis for data processing in the course of issuing invoices is Article 6(1)(c) of the Regulation, i.e. compliance with a legal obligation, as described above.

Source of personal data

The source of personal data is the Data Subject.

Access to personal data

Personal data are processed only by those employees of our Company whose duties include invoicing-related administration.

In connection with invoicing, the Data Controller engages the following service providers:

- **Csizmadia László Szilárd egyéni vállalkozó** (2730 Albertirsa, Pacsirta utca 58.) — Performance of accounting tasks;
- **Novitax Kft.** (1105 Budapest, Gitár u. 4.) — Operation of the invoicing system;
- **AX Technology Kft.** (1194 Budapest, Hamu u. 5) — IT solutions, provision of cloud-based storage.

The Data Processors may only process personal data for the purpose determined by the Data Controller and set out in the contract, in accordance with its instructions, and have no independent decision-making power with regard to data processing. The Data Processors have assumed confidentiality obligations and contractual guarantees regarding the preservation of personal data they become aware of while performing their duties.

In addition to the above, invoicing data may also be transferred to **Correct Kft.** (1026 Budapest, Bimbó út 182. Fsz. 3. ajtó), which performs audit-related tasks and acts as an independent data controller in the course of its duties.

Transfer of personal data to a third country or international organisation

The Company does not transfer personal data to any third country or international organisation.

Duration of personal data processing

Our Company processes the Data Subject's personal data for at least 8 years from the date of issuance, pursuant to Section 169(2) of Act C of 2000 on Accounting (2000. évi C. törvény).

Automated decision-making and profiling

Neither takes place during data processing.

Consequences of failure to provide personal data

The processing of all data is based on and mandated by law.

6. Management of claims

Purpose of data processing

The Data Controller has a legitimate interest in claiming and collecting its overdue receivables in the event of non-performance of contracts, using the means available under the law.

In the course of claims management, the Data Controller first notifies the non-performing contracting party of overdue receivables in writing. If the deadline set in the payment demand has elapsed without result, i.e. the claim has not been settled, the Data Controller enforces its claims through payment order proceedings or directly through civil litigation. Where the Data Controller holds a claim based on an enforceable instrument, it may also enforce its claims directly through enforcement proceedings.

Personal data processed

In the course of claims management, the Data Controller processes the following personal data of the Data Subjects (debtors), specifying for each item of data the precise purpose of data processing and the precise statutory reference prescribing the scope of data.

In the case of a natural person and a sole proprietor:

- the Data Subject's name, primarily for identification purposes (Fmhtv. 20. §, Pp. 170. §, Vht. 11. §);
- the Data Subject's place and date of birth, also for identification purposes (Vht. 11. §, Fmhtv. 20. §, Pp. 7. § (1) bekezdés 3. pont);
- the Data Subject's mother's name, for identification purposes (Vht. 11. §, Fmhtv. 20. §, Pp. 7. § (1) bekezdés 3. pont);
- in the absence of procedural capacity, the name and service address of the legal representative (Fmhtv. 20. §, Pp. 7. § (1) bekezdés 3. pont);
- data necessary for contacting the Data Subject, for the purpose of establishing contact and settling the debt: home address, registered seat address, service address (if different from the place of residence or domicile), which also serves for the posting of demand letters and payment orders and for initiating proceedings (Fmhtv. 20. §, Pp. 170. §, Vht. 11. §, Pp. 7. § (1) bekezdés 3. pont);
- data relating to the overdue debt or claim (Fmhtv. 20. §, Pp. 170. §);
- other data necessary for the enforcement of the claim (Fmhtv. 20. §, Pp. 170. §).

In the case of a legal person:

- the name and contact details of the representative and contact person, for the purpose of establishing contact in order to settle the debt.

Legal basis for data processing

The legal basis for data processing is the legitimate interest of the Data Controller under Article 6(1)(f) of the Regulation, which relates to the enforcement and collection of the Company's claims.

Source of personal data

The Data Subject, or if the Data Controller does not have sufficient information to carry out the necessary actions, public register(s).

Access to personal data

Personal data are processed only by those employees of the Data Controller whose duties include the processing of personal data.

The Data Controller may engage legal representation in the course of claims management. In such cases, the Data Controller transfers the personal and other data necessary for the performance of duties to the legal counsel. The legal counsel acts as an independent data controller in the performance of their duties.

Payment order proceedings are initiated before a notary public using a standard form. The notary public, and in the case of an objection or direct civil litigation, the competent court, processes personal data as an independent data controller.

In enforcement proceedings, the bailiff may access the personal data prescribed by the provisions of the Act on Enforcement. The bailiff acts as an independent data controller in the performance of their duties.

Transfer of personal data to a third country or international organisation

The Data Controller does not transfer personal data to any third country or international organisation.

Duration of personal data processing

The Data Controller processes personal data related to claims until the claims are recovered or until the statute of limitations is declared by a final and binding court decision.

Automated decision-making and profiling

Neither takes place during data processing.

Consequences of failure to provide personal data

The processing of all data is based on and mandated by law and is necessary for conducting the proceedings required to enforce the claim.

7. Data processing related to the provision of parking

A surface car park and an underground garage operate at Lurdy Shopping Centre (hereinafter collectively: "**Car Park**"). Vehicles may enter the Car Park only by purchasing a parking pass or parking ticket, and may exit by using a parking pass or exit ticket, or with a parking ticket after payment of the parking fee. Anyone is entitled to purchase a parking ticket or parking pass; however, only the Data Controller's tenants may purchase exit tickets — which entitle the holder to a single free exit.

As a general rule, no data processing takes place in connection with the purchase of a parking ticket, except where the purchaser requests an invoice. In such cases, data processing relating to the issuance and retention of invoices takes place in accordance with Section II.5 of this notice, noting that where the invoice request is made by e-mail, the Data Controller also processes the e-mail address of the requester in accordance with Section II.3 and this section.

The purchase of a parking pass is possible on the basis of a contract for that purpose and can be requested in connection with a specific vehicle. Data processing in connection with the parking pass contract takes place in accordance with Section II.4 of this notice, noting that the vehicle's registration number is also processed in connection with the contract, in accordance with this section.

Exit tickets may be requested by the Data Controller's tenants by e-mail — only the name needs to be provided in the e-mail. Exit tickets may only be used for exiting after the tenant's or its partners' short-term parking.

For the surface car park, the Data Controller operates a licence plate recognition system to facilitate faster and simpler entry and exit. In this connection, the system logs the licence plate numbers associated with entries and exits at the surface car park.

Purpose of data processing

Enabling parking in the most efficient manner possible for visitors, employees, tenants and tenants' employees and partners at Lurdy Shopping Centre, including the provision of parking passes and exit tickets to those requesting them, handling invoice requests in connection with the sale of parking tickets, and operating a licence plate recognition system to facilitate faster and simpler entry to and exit from the surface car park.

Personal data processed

a) Regarding parking tickets

In connection with an invoice request for a parking ticket, in addition to the data described in Section II.5 of this notice, the Data Controller also processes the requester's e-mail address (see also Section II.3 in this regard), where this is the communication channel between the parties.

b) Regarding parking passes

In connection with the contract for the purchase of a parking pass, in addition to the data set out in Section II.4 of this notice, the Data Controller also processes the registration number of the vehicle of the pass holder.

c) Regarding exit tickets

In the case of a request for an exit ticket, the Data Controller processes the data necessary to identify the tenant, the e-mail address of the tenant or contact person initiating the exit ticket request, and data relating to the validity of the exit ticket (see also Section II.3 in connection with e-mail communication).

d) Licence plate recognition system

The licence plate recognition system records the licence plate numbers of vehicles during entries and exits, as well as the direction and time of the vehicle's movement.

Legal basis for data processing

The legal basis for data processing is the legitimate interest of the Data Controller under Article 6(1)(f) of the Regulation, which consists in regulating the entry and exit of vehicles to and from Lurdy Shopping Centre, automating entry and exit and thereby making it as fast as possible, and, where necessary — through the operation of the licence plate recognition system — being able to retrospectively determine which vehicles were present in the Car Park.

Source of personal data

The source of personal data is the Data Subject.

Access to personal data

Only those employees of the Data Controller whose duties include the processing of personal data are authorised to process personal data.

In connection with the provision of parking, the Data Controller uses the services of the following Data Processors:

- **Célkereszt Zrt.** (1048 Budapest, Csíksomlyó utca 2. 2. ép. G. lház. 3. em. 10. ajtó) — Performance of security and guarding duties at Lurdy Shopping Centre, including access to the licence plate recognition system data.

- **ML-tronic Kft.** (9081 Győrújbarát, Mátyás krt. 25.) — Operation of parking software.

The Data Processors may only process personal data for the purpose determined by the Data Controller and set out in the contract, in accordance with its instructions, and have no independent decision-making power with regard to data processing. The Data Processors have assumed confidentiality obligations and contractual guarantees regarding the preservation of personal data they become aware of while performing their duties.

Transfer of personal data to a third country or international organisation

The Data Controller does not transfer personal data to any third country or international organisation.

Duration of personal data processing

Data related to invoicing and the purchase of a parking pass are processed for the periods specified in Sections II.3, II.4 and II.5.

The Data Controller processes data related to exit tickets for the validity period of the exit ticket (until the 20th day of the calendar month following the relevant month).

The Data Controller retains data stored in the licence plate recognition system for 1 year. Where data have been used in any official proceedings, they are retained for the limitation period following the conclusion of the proceedings.

Automated decision-making and profiling

Neither takes place during data processing.

Consequences of failure to provide personal data

The provision of personal data is voluntary; however, it is a condition for using the Car Park, noting that the underground garage may be used with a parking ticket without providing any personal data.

8. Data processing related to the Lurdy VIP programme

The Data Controller provides its tenants and the employees employed by its tenants with the opportunity to join the so-called Lurdy VIP programme, through which they may access special benefits when using the shops and services of Lurdy Shopping Centre (e.g. percentage discounts at restaurants in Lurdy Shopping Centre).

Joining the Lurdy VIP programme may be initiated by the tenant by e-mail — in the case of a natural person or sole proprietor tenant, by providing their own data, otherwise by providing the employees' data (name and e-mail address). The benefits offered by the Lurdy VIP programme may be redeemed through the Lurdy Application, in which Data Subjects must register using the e-mail address provided by the tenant. Following registration, a personalised QR code becomes available to Data Subjects in the application, and this QR code is also sent to their e-mail address. The personalised QR code entitles the Data Subject to redeem the discounts offered by the Data Controller.

Participants in the Lurdy VIP programme also have the option of subscribing to the Data Controller's programme-related newsletters. This subscription is entirely voluntary and is not a condition for joining the programme.

The Data Controller provides separate information on the processing of personal data in connection with the Lurdy Application by way of a separate privacy notice.

Purpose of data processing

Providing discounts to the Data Controller's tenants and the employees employed by tenants at the shops and services of Lurdy Shopping Centre through the operation of the Lurdy VIP programme. In this context, the purpose of data processing is to identify Data Subjects, maintain contact with them, and determine their eligibility to join the Lurdy VIP programme.

With regard to the newsletter service linked to the Lurdy VIP programme, the purpose of data processing is to provide information on promotions, discounts and exclusive offers related to the programme.

Personal data processed

The following data must be provided to join the Lurdy VIP programme:

In the case of a natural person or sole proprietor tenant:

- the tenant's name (identification, determination of VIP eligibility);
- e-mail address (contact-keeping, determination of VIP eligibility during registration in the Lurdy Application);

In the case of a legal person tenant:

- the employee's name (identification);
- the tenant's name (identification, determination of the employee's VIP eligibility);
- e-mail address (contact-keeping, determination of VIP eligibility during registration in the Lurdy Application).

In addition to the above, the Data Controller also processes the personalised QR code assigned to the Data Subject and data related to the redemption of discounts.

No additional data processing takes place in connection with the redemption of discounts.

With regard to newsletters related to the Lurdy VIP programme, the Data Controller only processes data relating to VIP eligibility, the Data Subject's e-mail address and data related to the subscription. In addition, the Data Controller also processes data related to the opening of the newsletter and the links contained therein.

Legal basis for data processing

The legal basis for data processing related to the Lurdy VIP programme — excluding the sending of newsletters — is the legitimate interest of the Data Controller under Article 6(1)(f) of the Regulation, namely its interest in expressing gratitude for the daily cooperation of its tenants and the employees employed by tenants through the provision of benefits, thereby strengthening its good relationship with tenants, and in making the time spent at Lurdy Shopping Centre more comfortable and more favourable for its tenants and tenants' employees through the Lurdy VIP programme. In this context, it is also in the Data Controller's legitimate interest to ensure that as many eligible persons as possible participate in the Lurdy VIP programme and that only eligible persons participate in it.

The legal basis for data processing related to the sending of newsletters linked to the Lurdy VIP programme is Article 6(1)(a) of the Regulation, i.e. the Data Subject's prior consent. The Data Subject

is entitled to withdraw this consent at any time — this does not affect their participation in the Lurdy VIP programme.

Source of personal data

The tenant, who, in the case of a natural person or sole proprietor tenant, also qualifies as a Data Subject in respect of their own data.

Access to personal data

Only those employees of the Data Controller whose duties include the processing of personal data are authorised to process personal data.

For the sending of newsletters, the Data Controller uses the MailChimp service, the operator of which is **The Rocket Science Group LLC d/b/a Mailchimp** (675 Ponce de Leon Ave NE Suite 5000 Atlanta, GA 30308, United States of America), which also qualifies as a Data Processor.

The Data Processor may only process the Data Subject's personal data for the purpose determined by the Data Controller and set out in the contract, in accordance with the Data Controller's instructions, and has no independent decision-making power with regard to data processing. The Data Processor has assumed confidentiality obligations and contractual guarantees regarding the preservation of personal data it becomes aware of while performing its duties.

Transfer of personal data to a third country or international organisation

The Data Controller does not transfer personal data to any third country or international organisation.

Duration of personal data processing

The Data Controller processes personal data until the termination of the Lurdy VIP membership. If the tenancy or the Data Subject's employment relationship with the tenant is terminated, the VIP membership also terminates. The Data Controller processes financial data related to discounted purchases in accordance with accounting rules.

Data processing relating to the sending of newsletters in connection with the Lurdy VIP programme takes place until the Data Subject withdraws their consent.

Automated decision-making and profiling

Neither takes place during data processing.

Consequences of failure to provide personal data

The provision of personal data is voluntary; however, it is a condition for participation in the Lurdy VIP programme and thereby for the redemption of discounts provided by the programme.

Subscription to the newsletter and the related provision of data is voluntary; however, it is a condition for the Data Subject to be informed by e-mail of the latest promotions related to the Lurdy VIP programme. Subscription to the newsletter is not a condition for joining the Lurdy VIP programme.

9. Complaint handling

Visitors to Lurdy Shopping Centre may submit complaints regarding the Data Controller's services. Complaints may be submitted to the Data Controller in person or by e-mail, either directly to the management or, in security and property protection matters, through the security service.

The Data Controller processes the personal data provided by the complainant and otherwise obtained in the course of complaint handling in order to handle and respond to the complaints received and to carry out the related administration.

In the course of complaint handling, for complaints falling within the scope of Act CLV of 1997 on Consumer Protection (1997. évi CLV. törvény; hereinafter: "**Consumer Protection Act**" or "**Fgytv.**"), i.e. complaints concerning the communal areas of the Shopping Centre that are used by all visitors (restrooms, car parks, etc.), the Data Controller acts in accordance with the provisions of the Consumer Protection Act.

Purpose of data processing

Handling complaints addressed to the Data Controller, including the examination and remedying of the complaint, taking the necessary measures, and responding to the complaint.

In the case of handling complaints under the Consumer Protection Act, a further purpose of data processing is to provide visitors (consumers) using the communal areas of the Shopping Centre, such as restrooms or car park facilities, with the possibility of submitting a complaint, and to handle such complaints in accordance with the provisions of the Consumer Protection Act.

Personal data processed

The Data Controller processes the data necessary for handling complaints submitted to it, including in particular data necessary for identifying the Data Subject and maintaining contact in connection with the complaint (name, e-mail address, and possibly telephone number), personal data presented in connection with the complaint, and, where an on-site report has been drawn up in connection with the complaint (e.g. an accident report), the data contained in the report.

In the case of a consumer complaint submitted pursuant to Section 17/A(5) of the Consumer Protection Act, the Company processes the following personal data:

- a) the consumer buyer's name and home address,
- b) the place, date and method of submission of the complaint or request,
- c) a detailed description of the consumer's request or complaint, the list of documents and other evidence presented by the consumer,
- d) the Data Controller's statement on its position regarding the consumer's request or complaint, where its immediate response or investigation is possible,
- e) the signature of the person recording the minutes and — with the exception of oral complaints communicated by means of electronic communication services — the consumer's signature,
- f) the place and date of recording the minutes,
- g) in the case of an oral complaint communicated by telephone or other electronic communication service, the unique identification number of the complaint.

Where the method of submitting the complaint or request is by electronic message, the Data Controller also processes the Data Subject's e-mail address as specified in this notice. Where the

consumer voluntarily provides their telephone number in the interest of more efficient complaint handling, the Data Controller also processes this data for the purpose of direct contact.

Legal basis for data processing

The legal basis for data processing in connection with the handling of complaints under the Consumer Protection Act is compliance with a legal obligation under Article 6(1)(c) of the Regulation, specifically the provisions set out in Section 17/A(5) of the Consumer Protection Act.

The legal basis for data processing related to other complaint handling is the legitimate interest of the Data Controller under Article 6(1)(f) of the Regulation, namely its interest in handling and responding to complaints received and thereby improving the quality of its services and increasing visitor satisfaction.

Source of personal data

The person submitting the complaint, who also qualifies as a Data Subject in respect of their own data.

In security or property protection matters, it may occur that the Data Subject submits their complaint not directly to the Data Controller but to the security service. In such cases, the Data Controller receives the data from **Célkereszt Zrt.** (registered seat: 1048 Budapest, Csíksomlyó utca 2. 2. ép. G. lház. 3. em. 10. ajtó), which performs security duties.

Access to personal data

Only those employees of the Data Controller whose duties include the processing of personal data are authorised to process personal data.

Where the Data Subject's complaint concerns a security or property protection matter, **Célkereszt Zrt.** (1048 Budapest, Csíksomlyó utca 2. 2. ép. G. lház. 3. em. 10. ajtó) may participate in its investigation, acting as a Data Processor.

The Data Processor may only process the Data Subject's personal data for the purpose determined by the Data Controller and set out in the contract, in accordance with the Data Controller's instructions, and has no independent decision-making power with regard to data processing. The Data Processor has assumed confidentiality obligations and contractual guarantees regarding the preservation of personal data it becomes aware of while performing its duties.

Transfer of personal data to a third country or international organisation

The Data Controller does not transfer personal data to any third country or international organisation.

Duration of personal data processing

Pursuant to Section 17/A(7) of the Consumer Protection Act, the Data Controller is required to retain documents related to complaints under the Consumer Protection Act for 3 years. The Data Controller retains data related to other complaint handling until the end of the calendar year following the closure of the matter to which the complaint relates.

Automated decision-making and profiling

Neither takes place during data processing.

Consequences of failure to provide personal data

The provision of personal data is voluntary; however, it may be necessary for the examination and remedying of the matters set out in the complaint (depending on the nature of the complaint) and is certainly necessary for responding to the complaint.

10. Taking and use of photographs and video recordings

The Data Controller may take photographs and video recordings (hereinafter collectively: "**recording(s)**") of its visitors for the purpose of presenting and promoting the services of Lurdy Shopping Centre. The majority of the recordings do not depict the persons appearing in them in an individualised manner, as the purpose of making the recordings is to present the atmosphere of the venue, the operation of the service, or the event in question. At the same time, for promotional purposes, the Data Controller also makes video recordings in which, for example, it asks visitors to share their thoughts on a particular topic. Participation in such recordings is also voluntary; the visitor is free to decide whether or not to stop and appear in the recording.

The Data Controller publishes the recordings on its websites referred to in Section II.1 and on the Social Media Pages referred to in Section II.2.

Where recordings are made at an event organised by the Data Controller, it informs participants in advance in its promotional materials and also places clear information to this effect at the venue.

Regardless of the type of recording, anyone who does not wish to appear in the recordings has the opportunity not to do so. The taking of photographs and video recordings always takes place in a clearly visible manner, so Data Subjects have the opportunity to move out of the camera's field of view or to indicate that they do not wish to appear in the recording. The Data Subject is also entitled to object at any time, including retrospectively, to the sharing (use) of the photograph depicting them or the video recording featuring them.

Purpose of data processing

The purpose of making and using the recordings is to present the Data Controller's services to those interested, to promote such services, and to illustrate events held by the Data Controller or others at Lurdy Shopping Centre through photo reports, by means of publication on the website and the Social Media Pages.

Personal data processed

The likeness of the persons appearing in the recording, and in the case of video recordings, their likeness, behaviour, and voice, and possibly what the Data Subject has said in the recording.

Legal basis for data processing

The legal basis for data processing is the legitimate interest of the Data Controller under Article 6(1)(f) of the Regulation. The Data Controller's legitimate interest can be identified as providing those interested with insight into the services it offers, the events held by it or others at Lurdy Shopping Centre and their atmosphere, by making and publishing recordings, thereby promoting its services. The Data Controller therefore uses the recordings for marketing purposes in order to attract as many

visitors as possible to Lurdy Shopping Centre and to illustrate its various programmes with photo reports on its online platforms.

Source of personal data

The recordings are, as a general rule, made by an employee employed by the Data Controller. However, if the Data Controller engages the services of an external partner (photography partner, marketing agency, influencer), it provides information on a case-by-case basis.

Access to personal data

Only those employees of the Data Controller whose duties include the processing of personal data are authorised to process personal data.

Where an external partner makes the recordings, the Data Controller provides information on a case-by-case basis about their identity. The partner, since they have access to the recordings, acts as a Data Processor in the course of their activities.

As operator of the website and as contributor to the management of the Social Media Pages, **Absolute Done Kft.** (registered seat: 1095 Budapest, Gát utca 21. Fsz. 1. ajtó) and **ESD Content Kft.** (registered seat: 1068 Budapest, Király utca 110. 1. em. 6.), as Data Processors, have access to personal data related to the operation of the websites and Social Media Pages.

The Data Processors may only process the Data Subject's personal data for the purpose determined by the Data Controller and set out in the contract, in accordance with the Data Controller's instructions, and have no independent decision-making power with regard to data processing. The Data Processors have assumed confidentiality obligations and contractual guarantees regarding the preservation of personal data they become aware of while performing their duties.

Transfer of personal data to a third country or international organisation

The Data Controller does not transfer personal data to any third country or international organisation; however, due to the borderless nature of the internet, the uploaded recordings may be accessed by anyone — regardless of geographical location — after uploading. The Data Controller has no influence over the use to which persons who access the recordings published on the internet may put them and assumes no responsibility in this regard.

Duration of personal data processing

The Data Controller does not delete the recordings from the above platforms, except at the express request of the Data Subject, in the event of an objection to the data processing.

Automated decision-making and profiling

Neither takes place during data processing.

Provision of personal data

The provision of personal data is voluntary and is not a condition for using the Data Controller's services.

11. Organisation and conduct of prize draws

The Data Controller announces prize draws on its Social Media Pages referred to in Section II.2. The conditions for participation in the prize draw and the course of the prize draw are set out in the rules applicable to the particular prize draw.

A condition for participation in a prize draw announced on a Social Media Page is typically posting a comment on the post announcing the prize draw.

Purpose of data processing

The organisation and conduct of the prize draw.

Personal data processed

Data necessary for identifying the participant (player) in the prize draw, maintaining contact with them during the prize draw, and delivering the prize (post, e-mail, etc.).

In addition, in connection with prize draws conducted on Social Media Pages, the Data Controller processes data appearing in connection with the Data Subject's comment in order to verify fulfilment of the condition for participation in the prize draw (the comment itself does not contain personal data), including the Data Subject's username and profile picture set by them.

Legal basis for data processing

The legal basis for data processing is the legitimate interest of the Data Controller under Article 6(1)(f) of the Regulation, namely its interest in promoting its services through the organisation of prize draws, drawing attention to them as widely as possible, and, in the case of prize draws conducted on Social Media Pages, increasing activity on the Social Media Page.

Source of personal data

The Data Subject.

Access to personal data

Only those employees of the Data Controller whose duties include the processing of personal data are authorised to process personal data.

Where the prize is not delivered by e-mail or through the Social Media Page's messaging service (e.g. electronic gift voucher) but is a physical prize, the Data Controller may transfer the data necessary for delivering the prize to the winner to the delivery company, which acts as an independent data controller and whose identity the Data Controller discloses on a case-by-case basis.

As operator of the website and as contributor to the management of the Social Media Pages, **Absolute Done Kft.** (registered seat: 1095 Budapest, Gát utca 21. Fsz. 1. ajtó) and **ESD Content Kft.** (registered seat: 1068 Budapest, Király utca 110. 1. em. 6.), as Data Processors, have access to personal data related to the operation of the websites and Social Media Pages.

The Data Controller may also engage an external organisation to conduct the prize draw. Typically, **Absolute Done Kft.** (registered seat: 1095 Budapest, Gát utca 21. Fsz. 1. ajtó) qualifies as such, and as a Data Processor, it has access to the data of participants necessary for the conduct of the prize draw. Where another external partner participates in the conduct of the prize draw, the Data Controller provides information on the identity of such partner on a case-by-case basis in the prize draw rules.

The Data Processors may only process the Data Subject's personal data for the purpose determined by the Data Controller and set out in the contract, in accordance with the Data Controller's instructions, and have no independent decision-making power with regard to data processing. The Data Processors have assumed confidentiality obligations and contractual guarantees regarding the preservation of personal data they become aware of while performing their duties.

The Data Controller may publicly announce the identity of the winner(s) of prize draws announced on Social Media Pages.

In the case of a prize draw announced on a Social Media Page

In respect of the Facebook Page and the Instagram Page, Meta Ireland's general privacy notice is available at <https://hu-hu.facebook.com/privacy/explanation> and <https://privacycenter.instagram.com/policy/>. For data protection inquiries, Meta Ireland's Data Protection Officer can be contacted at: <https://www.facebook.com/help/contact/540977946302970>.

In respect of the TikTok Channel, TikTok Ireland's general privacy notice is available at <https://www.tiktok.com/legal/privacy-policy?lang=en#privacy-eea>. For data protection inquiries, the Data Protection Officer can be contacted at: <https://www.tiktok.com/legal/report/privacy?lang=en>.

Transfer of personal data to a third country or international organisation

The Data Controller does not transfer personal data to any third country or international organisation; however, due to the borderless nature of the internet, data shared on a public online platform (e.g. participant's comment, result of the prize draw) may be accessed by anyone. The Data Controller has no influence over the use to which persons who access the data published on the internet may put them and assumes no responsibility in this regard.

Duration of personal data processing

The Data Controller processes the personal data of prize draw participants until the announcement of the results, and in respect of winners, until the delivery of the prize.

Where the prize draw is conducted on a Social Media Page, the Data Controller does not delete the post or video announcing the prize draw and the associated comments, except at the express request of the Data Subject (although the Data Subject may also delete their own comment themselves).

Where the Data Controller must fulfil a tax payment obligation in connection with the delivery of a prize, such data are retained in accordance with the applicable tax and accounting legislation.

Automated decision-making and profiling

Neither takes place during data processing.

Provision of personal data

The provision of personal data is voluntary; however, it is a condition for participation in the prize draw.

12. Sending of newsletters

The website provides the opportunity to subscribe to the Data Controller's newsletter for those who wish to receive direct information about news related to Lurdy Shopping Centre, including news, current offers, discounts and programmes concerning the Shopping Centre.

Subscription to the newsletter is voluntary in all cases.

Purpose of data processing

The purpose of data processing is for the Data Controller to provide continuous and relevant information to those interested about the services, current offers and programmes of Lurdy Shopping Centre in a more direct manner.

Personal data processed

The Data Controller processes the Data Subjects' e-mail address, as well as data relating to the time of subscription and the giving of consent.

In addition, the Data Controller also processes data related to the opening of the newsletter and the links contained therein.

Legal basis for data processing

The legal basis for data processing is the Data Subject's prior, voluntary consent under Article 6(1)(a) of the Regulation.

The Data Subject may withdraw their previously given consent at any time by sending a request to adatvedelem@lurdyhaz.hu, or automatically by clicking the unsubscribe link in the newsletters. The withdrawal of consent does not affect the lawfulness of data processing carried out prior to the withdrawal.

Source of personal data

The source of personal data is the Data Subject.

Access to personal data

Only those employees of the Data Controller whose duties include this task are authorised to access the personal data provided by the Data Subject, in compliance with the principle of purpose limitation.

For the sending of newsletters, the Data Controller uses the MailChimp service, the operator of which is **The Rocket Science Group LLC d/b/a Mailchimp** (675 Ponce de Leon Ave NE Suite 5000 Atlanta, GA 30308, United States of America), which qualifies as a Data Processor.

The Data Processor may only process the Data Subject's personal data for the purpose determined by the Data Controller and set out in the contract, in accordance with the Data Controller's instructions, and has no independent decision-making power with regard to data processing. The Data Processor has assumed confidentiality obligations and contractual guarantees regarding the preservation of personal data it becomes aware of while performing its duties.

Transfer of personal data to a third country or international organisation

The Data Controller does not transfer the Data Subject's personal data referred to above to any third country or international organisation.

Duration of personal data processing

Data processing takes place until the Data Subject withdraws their consent.

Automated decision-making and profiling

Neither takes place during data processing.

Consequence of failure to provide personal data

The provision of data is voluntary; however, without it, the Data Subject cannot subscribe to the Data Controller's newsletter.

III. DATA PROCESSORS ENGAGED BY THE DATA CONTROLLER

We engage the following Data Processors for data processing:

- **Absolute Done Kft.** (1095 Budapest, Gát utca 21. Fsz. 1. ajtó)

Task performed: management of the website and Social Media Pages, conduct of prize draws organised by the Data Controller.

- **ESD Content Kft.** (1068 Budapest, Király utca 110. 1. em. 6.)

Task performed: management of the website and Social Media Pages.

- **Célkereszt Zrt.** (1048 Budapest, Csíksomlyó utca 2. 2. ép. G. lház. 3. em. 10. ajtó)

Task performed: performance of security and guarding duties at Lurdy Shopping Centre, participation in the investigation of complaints concerning security or property protection matters.

- **ML-tronic Kft.** (9081 Győrújbarát, Mátyás krt. 25.)

Task performed: operation of parking software.

- **Csizmadia László Szilárd egyéni vállalkozó** (2730 Albertirsa, Pacsirta utca 58.)

Task performed: performance of accounting (and payroll) tasks.

- **Novitax Kft.** (1105 Budapest, Gitár u. 4.)

Task performed: operation of the invoicing system.

- **AX Technology Kft.** (1194 Budapest, Hamu u. 5)

Task performed: IT solutions, provision of cloud-based storage.

- **Microsoft Ireland Operations Limited** (One Microsoft Place, South County Business Park, Leopardstown, Dublin 18, Ireland)

Task performed: provision of cloud e-mail services (Office 365).

- **The Rocket Science Group LLC d/b/a Mailchimp** (675 Ponce de Leon Ave NE Suite 5000 Atlanta, GA 30308, United States of America)

Task performed: provision of the Mailchimp newsletter service, participation in the sending of newsletters.

The Data Processors engaged by the Data Controller may only process personal data for the purpose determined by the Data Controller and set out in the contract, in accordance with the Data Controller's instructions, and have no independent decision-making power with regard to data

processing. The Data Processors have assumed confidentiality obligations and contractual guarantees regarding the preservation of personal data they become aware of while performing their duties.

IV. RIGHTS OF THE DATA SUBJECT IN CONNECTION WITH DATA PROCESSING

Right to information

The Data Subject has the right to receive information about data processing, which the Data Controller fulfils by making this notice available.

Data processing based on consent

Where the legal basis for data processing is the Data Subject's consent, the Data Subject is entitled to withdraw their consent given for data processing at any time. However, it is important to know that the withdrawal of consent may only relate to data the processing of which has no other legal basis. Where there is no other legal basis for the processing of the Data Subject's personal data, the Data Controller will permanently and irreversibly delete the personal data following the withdrawal of consent. Pursuant to the Regulation, the withdrawal of consent does not affect the lawfulness of data processing carried out on the basis of consent prior to the withdrawal.

Right of access

At the Data Subject's request, the Data Controller shall at any time provide information as to whether the processing of the Data Subject's personal data is in progress and, if so, shall provide access to the 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 or which the Data Controller has disclosed or will disclose the personal data, including in particular recipients in third countries or international organisations;
- d) the envisaged period for which the personal data will be stored, or if this is not possible, the criteria used to determine that period;
- e) the Data Subject shall further be informed of their right to request from the Data Controller the rectification, erasure or restriction of processing of personal data concerning them, and to object to the processing of such personal data;
- f) the Data Subject shall also be informed of their right to lodge a complaint with a supervisory authority or to initiate court proceedings;
- g) where the data were not collected directly from the Data Subject by the Data Controller, any available information as to the source of the data;
- h) the existence of automated decision-making, including profiling, and, at least in such cases, meaningful information about the logic involved and the significance and envisaged consequences of such processing for the Data Subject.

The Data Controller shall also provide a copy of the personal data being processed upon request.

Right to rectification of personal data

The Data Subject shall have the right at any time to request that the Data Controller rectify inaccurate personal data concerning them without undue delay. Taking into account the purposes of the processing, the Data Subject shall also have the right to have incomplete personal data completed, including by means of providing a supplementary statement.

In the event of a request for rectification (modification) of data, the Data Subject must substantiate the accuracy of the modified data, and the Data Subject must also prove that the request for modification is being made by the person authorised to do so. Only in this way can the Data Controller assess whether the new data are accurate and, if so, whether it may modify the previous data.

The Data Controller further draws attention to the fact that the Data Subject should report any changes to their personal data as soon as possible, thereby also facilitating lawful data processing and the exercise of their rights.

Right to erasure

At the Data Subject's request, the Data Controller shall be obliged to erase the personal data concerning the Data Subject without undue delay where one of the following grounds applies:

- a) the Data Controller no longer needs the personal data for the purposes for which they were collected or otherwise processed;
- b) in the case of data processing based on consent, the Data Subject withdraws their consent on which the processing is based, and there is no other legal basis for the processing;
- c) the Data Subject objects to the processing and there are no overriding legitimate grounds for the processing, or the Data Subject objects to the processing for the purposes of direct marketing;
- d) the personal data have been unlawfully processed by the Data Controller;
- e) the personal data have to be erased for compliance with a legal obligation in Union or Member State law to which the Data Controller is subject;
- f) the personal data have been collected in relation to the offer of information society services.

Right to restriction of processing

The Data Subject shall have the right to request that the Data Controller restrict processing where one of the following applies:

- a) the accuracy of the personal data is contested by the Data Subject; in this case, the restriction applies for a period enabling the Data Controller to verify the accuracy of the personal data;
- b) the processing is unlawful and the Data Subject opposes the erasure of the personal data and requests the restriction of their use instead;
- c) the Data Controller no longer needs the personal data for the purposes of the processing, but they are required by the Data Subject for the establishment, exercise or defence of legal claims; or
- d) the Data Subject has objected to processing; in this case, the restriction applies for the period until it is determined whether the legitimate grounds of the Data Controller override those of the Data Subject.

Right to object

Where the legal basis for the processing of personal data is the legitimate interest of the Data Controller [Article 6(1)(f) of the Regulation] or where the processing is necessary for the performance of a task carried out in the exercise of official authority vested in the Data Controller [Article 6(1)(e) of the Regulation], the Data Subject shall have the right to object, on grounds relating to their particular situation, at any time to the processing of their personal data, including profiling based on those provisions.

Where the Data Controller processes personal data for the purposes of direct marketing (i.e. for example, sending informational letters), the Data Subject shall have the right to object at any time to the processing of personal data concerning them for such marketing, including profiling to the extent that it is related to such direct marketing. Where the Data Subject objects to the processing of personal data for direct marketing purposes, the personal data shall no longer be processed for such purposes.

Legitimate interest assessment

Where the legal basis for the processing of personal data is the legitimate interest of the Data Controller or a third party under Article 6(1)(f) of the Regulation, we prepare a written "legitimate interest assessment" on the basis of Recital 47 and Article 5(2) of the Regulation, which the Data Subject may request by writing to **adatvedelem@lurdyhaz.hu**.

Right to data portability

The Data Subject shall have the right to receive the personal data concerning them, which they have provided to the Data Controller, in a structured, commonly used and machine-readable format, and shall have the right to transmit those data to another controller, where:

- a) the processing is based on the Data Subject's consent or on a contract under Article 6(1)(b) of the Regulation; and
- b) the processing is carried out by automated means.

PROCEDURE FOR EXERCISING THE RIGHTS OF THE DATA SUBJECT

The Data Subject may exercise the above rights by sending an electronic message to **adatvedelem@lurdyhaz.hu**, by sending a postal letter to the Data Controller's registered seat, or in person at the Data Controller's registered seat. The Data Controller shall commence the examination and fulfilment of the Data Subject's request without undue delay following its receipt. The Data Controller shall inform the Data Subject of the measures taken on the basis of the request within 1 month of receipt. Where the Data Controller is not in a position to comply with the request, it shall inform the Data Subject within 1 month of the reasons for the refusal and of their right to legal remedies.

Within five years following the death of the Data Subject, the rights set out in this notice that the deceased was entitled to during their lifetime may be exercised by a person authorised by the Data Subject through an administrative disposition or a declaration made in a public document or private document of full probative force filed with the Data Controller — where the Data Subject has made more Than óné declaration with a data controller, the declaration made at the later date shall

prevail. If the Data Subject has not made such a legal declaration, in the absence thereof, a close relative under Act V of 2013 on the Civil Code (2013. évi V. törvény) shall also be entitled to exercise the right to rectification (Article 16 of the Regulation) and the right to object (Article 21 of the Regulation), as well as — where the processing was already unlawful during the Data Subject's lifetime or the purpose of the processing ceased upon the Data Subject's death — the right to erasure (Article 17 of the Regulation) and the right to restriction of processing (Article 18 of the Regulation), being rights that the deceased was entitled to during their lifetime, within five years following the death of the Data Subject. The close relative who first exercises this entitlement shall be entitled to exercise the Data Subject's rights under this paragraph.

V. RIGHT TO LEGAL REMEDIES IN CONNECTION WITH DATA PROCESSING

In order to enforce their right to judicial remedy, the Data Subject may bring proceedings before a court against our Company if they consider that our Company, a Data Processor engaged or acting on our behalf, or a joint controller, processes their personal data in breach of the requirements laid down in the legislation on the processing of personal data or in a binding legal act of the European Union. The court shall act with priority in such cases. Jurisdiction over the case lies with the regional court (törvényszék). The proceedings may also be brought — at the Data Subject's choice — before the regional court of the Data Subject's place of residence or habitual residence, or the regional court of our Company's registered seat (Court finder: <https://birosag.hu/birosag-kereso>).

Anyone may initiate an investigation against the Company by filing a complaint with the NAIH (National Authority for Data Protection and Freedom of Information) (Nemzeti Adatvédelmi és Információszabadság Hatóság), claiming that a violation of rights has occurred or there is a direct threat thereof in connection with the processing of personal data, or that the Company restricts the exercise of their rights related to data processing or refuses their request for the exercise of such rights. The complaint may be submitted at any of the following contact details:

NAIH (National Authority for Data Protection and Freedom of Information)

(Nemzeti Adatvédelmi és Információszabadság Hatóság)

Postal address: 1363 Budapest, Pf. 9.

Address: 1055 Budapest, Falk Miksa utca 9-11.

E-mail: ugyfelszolgalat@naih.hu

URL: <http://naih.hu>

Budapest, 25 March 2026