

PRIVACY NOTICE

I. INTRODUCTION OF THE DATA CONTROLLER

Lurdy-Ház Bevásárló- és Irodacentrum Korlátolt Felelősségű Társaság (Lurdy-Ház Shopping and Office Centre Limited Liability Company) (hereinafter: "**Company**", "**Data Controller**", "**we**") has prepared the following privacy notice in order to ensure the lawfulness of its internal data processing activities and to safeguard the rights of data subjects.

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

The Data Controller processes personal data in accordance with all applicable legislation, in particular:

- Act CXII of 2011 on the Right of Informational Self-Determination and on Freedom of Information (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: "**Regulation**" or "**GDPR**").

The Data Controller treats personal data confidentially and takes all technical and organisational measures necessary to ensure the secure storage and processing of data.

Definitions

The terminology used in this privacy notice corresponds to the definitions set out in Article 4 of the Regulation, supplemented where applicable by the definitions in Section 3 of the Infotv.

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

II. PURPOSE OF PROCESSING: Operation of an Electronic Surveillance System

The Data Controller operates a camera surveillance system capable of recording images (hereinafter: "**camera system**") at the Lurdy Shopping, Office and Event Centre located at **1097 Budapest, Könyves Kálmán krt. 12-14.**, which also serves as the registered seat of the Data Controller (hereinafter: "**Property**"), in order to ensure the protection of visitors' belongings and physical integrity during opening hours, the physical integrity of employees during their working hours, as well as the protection

of the property of staff and of the Data Controller itself, and the protection of trade secrets, both during and outside opening and working hours.

The Data Controller fulfils its obligation to provide information in connection with the operation of the camera system as described above by means of this privacy notice.

In addition to the above, the Data Controller also operates cameras that are not capable of identifying individuals, for the purpose of measuring visitor traffic at the Property and compiling related statistics. However, no processing of personal data takes place in connection with these cameras. For the sake of completeness, this notice also provides information on such cameras.

Purpose of processing

The purpose of the processing of personal data in connection with live monitoring and the recording of footage is the protection of property, the protection of assets of significant value and trade secrets, as well as the protection of the physical integrity of persons present on the premises of the Property.

Within the scope of property protection, the further purpose of operating the camera system is the prevention and detection of unlawful acts, the apprehension of perpetrators and the facilitation of their identification. Within the scope of protecting life and physical integrity, the purpose of processing is to investigate the circumstances of personal injuries and to enable recordings to be used as evidence in proceedings before the authorities.

The Data Controller's purpose also extends to the prevention of unlawful acts, given that the operation of the camera system in itself constitutes a significant deterrent against the potential commission of offences.

Personal data processed

In connection with the operation of the camera system, the Data Controller processes the image, movements and behaviour of data subjects, as well as any conclusions that may be drawn from these regarding the data subject.

During the operation of the camera system, video recordings containing personal data are made, on which the exact date also appears. No audio recording takes place.

Legal basis of processing

The legal basis of processing is the legitimate interest of the Data Controller pursuant to Article 6(1)(f) of the Regulation.

The legitimate interest of the Data Controller consists in ensuring, through the operation of the camera system, the security of property, the protection of trade secrets and the physical integrity of persons present in the area monitored by the camera system, and in this context, preventing any potential unlawful acts against these interests, as well as ensuring that, in the event of an unlawful act, the circumstances of the incident can be investigated by reviewing the recorded footage.

Within the specified retention period, the Data Controller may use the recordings as evidence in proceedings before authorities or courts for the purpose of detecting unlawful acts, apprehending or identifying perpetrators, establishing the extent of damage, and investigating the circumstances of unlawful acts and personal injuries.

The legitimate interest of the Data Controller also exists with respect to the prevention of unlawful acts, since the operation of the camera system in itself constitutes a significant deterrent against the potential commission of offences.

Data subjects have the right to object to the processing.

Source of personal data

The source of the personal data is the data subject.

Monitored area

The floor plans containing information on the location and viewing angle of individual cameras, and thus on the monitored areas, form Annex 1 to this notice.

Use of recordings

Review of recorded footage takes place in the event of an unlawful act, personal injury or damage, and where necessary to ensure the exercise of data subject rights, in particular for the purpose of identifying the perpetrator, clarifying the circumstances of the incident or ensuring the exercise of data subjects' rights.

For the purpose of use in judicial or administrative proceedings, the recorded footage is transmitted to the competent court or authority. No other transfer of the recordings takes place.

Retention period of personal data

Live monitoring operates 24 hours a day on the premises of the Property.

The Data Controller retains recorded footage for 72 hours in the absence of use.

Data security measures; review of recorded footage

The live feed of the camera system may only be monitored by authorised persons, following identification.

An Avigilon digital camera system operates on the premises of the Property; the recordings are stored on equipment owned by the Data Controller, on its own storage facility.

Access to stored recordings takes place only in a secure manner and in such a way that the identity of the person accessing the recordings can be established. The Data Controller documents all reviews of stored footage and any copies made of the recordings.

Review of recorded footage takes place exclusively in justified cases that are entered in a register. Only one of the purposes specified above may serve as justification for the review of footage. The register records the purpose and reason for the review, the time of the review, the precise identity of the persons who viewed the footage, and the actions taken on the basis of the review.

Access to personal data

The personal data provided by the data subject may only be accessed by those employees of the Data Controller whose job duties so require, in compliance with the principle of purpose limitation.

In connection with the operation of the camera system, 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) — an organisation performing security and guarding tasks in respect of the Property, which has access to both the live feed and the recorded footage.
- **TVT Vagyonvédelmi Zrt.** (1119 Budapest, Major utca 61.) — the organisation responsible for the maintenance of the camera system, which has access to both the live feed and the recorded footage.

The above data processors may process the personal data of data subjects solely for the purposes determined by the Data Controller and set out in the relevant contract, and in accordance with the instructions of the Data Controller; they have no independent decision-making authority with respect to the processing. The data processors have assumed confidentiality obligations and contractual guarantees regarding the safeguarding of personal data that come to their knowledge in the course of performing their duties.

The operation of the cameras that enable the compilation of visitor statistics and do not involve the processing of personal data is carried out on behalf of the Data Controller by the following service provider:

- **AX Technology Kft.** (1194 Budapest, Hamu utca 5.) — the operator of the camera system used for the compilation of visitor statistics (Intellio, Custer).

Automated decision-making and profiling

Neither automated decision-making nor profiling takes place in the course of the processing.

Consequences of failure to provide personal data

The cameras record 24 hours a day; therefore, entering the field of view of the cameras results in automatic and mandatory processing.

III. RIGHTS OF DATA SUBJECTS IN RELATION TO PROCESSING

Right to information

The data subject has the right to receive information about the processing of personal data. The Data Controller fulfils this right by making this notice available.

Right of access

Upon request, the Data Controller shall at any time inform the data subject whether processing of his or her 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 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 that is not possible, the criteria used to determine that period;
- e) the data subject is further informed of his or her right to request the rectification, erasure or restriction of processing of personal data relating to him or her, and to object to the processing of such personal data;
- f) the right to lodge a complaint with a supervisory authority and the right to initiate judicial proceedings;
- g) where the personal data were not collected directly from the data subject, all available information as to their source;
- h) the existence of automated decision-making, including profiling, and, at least in those cases, meaningful information about the logic involved, the significance and the envisaged consequences of such processing for the data subject.

Upon request, the Data Controller shall also provide the data subject with a copy of the personal data undergoing processing.

Right to rectification of personal data

The data subject shall have the right to obtain from the Data Controller without undue delay the rectification of inaccurate personal data concerning him or her. 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.

Where rectification (amendment) of data is requested, the data subject must substantiate the accuracy of the amended data and must also prove that the request is 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 the previous data may be amended.

The Data Controller further draws attention to the fact that the data subject should report any changes to his or her personal data without delay, thereby facilitating lawful processing and the enforcement of the data subject's rights.

Right to erasure

Upon the data subject's request, the Data Controller shall erase personal data relating to the data subject without undue delay if any of the following grounds applies:

- a) the personal data are no longer necessary for the purposes for which the Data Controller collected or otherwise processed them;
- b) where processing is based on consent, the data subject withdraws the 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 processing for direct marketing purposes;
- d) the personal data have been unlawfully processed by the Data Controller;

- e) the personal data must be erased for compliance with a legal obligation under Union or Member State law to which the Data Controller is subject;
- f) the personal data were collected in relation to the offer of information society services.

Right to restriction of processing

The data subject shall have the right to obtain from the Data Controller restriction of 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 the 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 processing, but the data subject requires them 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 established whether the legitimate grounds of the Data Controller override those of the data subject.

Right to object

Since the legal basis for the processing of personal data is the legitimate interest of the Data Controller [Article 6(1)(f) of the Regulation], the data subject shall have the right to object, on grounds relating to his or her particular situation, at any time to the processing of personal data concerning him or her, including profiling based on those provisions.

Legitimate interest assessment

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

PROCEDURE FOR THE EXERCISE OF DATA SUBJECT RIGHTS

The data subject may exercise the above rights by sending an electronic message to adatvedelem@lurdyhaz.hu, by postal mail sent to the registered seat of the Data Controller, or in person at the registered seat of the Data Controller. The Data Controller shall commence the examination and fulfilment of the data subject's request without undue delay upon its receipt. The Data Controller shall inform the data subject of the measures taken in response to the request within one month of receipt. If the Data Controller is unable to comply with the request, it shall inform the data subject of the reasons for the refusal and of the data subject's rights of redress within one month.

Within five years following the death of the data subject, the rights defined in this notice that the deceased was entitled to during his or her lifetime may be exercised by a person authorised by the data subject by means of a case management declaration, or by a statement made in an authentic

instrument or a private document with full probative force filed with the Data Controller — if the data subject made more than one statement to a data controller, the statement made at the later date shall apply. If the data subject did not make such a declaration, the close relative within the meaning of the Civil Code shall be entitled, even in the absence thereof, to exercise the rights under Article 16 (right to rectification) and Article 21 (right to object) of the Regulation, and — if the processing was already unlawful during the data subject's lifetime or the purpose of the processing ceased upon the death of the data subject — the rights under Article 17 (right to erasure) and Article 18 (right to restriction of processing) of the Regulation, which the deceased was entitled to during his or her lifetime, within five years following the death of the data subject. The close relative who first exercises such entitlement shall be authorised to exercise the data subject's rights under this paragraph.

IV. LEGAL REMEDIES IN RELATION TO PROCESSING

In order to enforce the right to judicial remedy, the data subject may bring an action before a court against the Data Controller if, in the data subject's view, the Data Controller, or a data processor engaged by or acting on the instructions of the Data Controller, processes the data subject's personal data in breach of the provisions laid down in legislation governing the processing of personal data or in binding legal acts of the European Union. The court shall act on the case as a matter of priority. The case falls within the jurisdiction of the regional court (törvényszék). The action may also be brought — at the data subject's choice — before the regional court of the data subject's domicile or habitual residence, or before the regional court of the registered seat of the Data Controller (<https://birosag.hu/birosag-kereso>).

Any person may initiate an investigation by filing a complaint with the National Authority for Data Protection and Freedom of Information (NAIH) against the Data Controller, claiming that a violation of rights has occurred in connection with the processing of personal data, or that there is a direct threat thereof, or that the Data Controller restricts the enforcement of the data subject's rights relating to processing, or rejects the data subject's request aimed at enforcing such rights. The complaint may be filed at the following contact details:

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

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

Annex:

Annex 1: Areas monitored by individual installed cameras

Annex 1: Areas monitored by individual installed cameras (floor plans)

[Floor plan images from the original Hungarian document are not included in this translation. Please refer to the original Hungarian version for the camera placement floor plans.]