

## Privacy Notice

Date of entry into force: 09.11.2023.

### NAME AND CONTACT DETAILS OF THE CONTROLLER

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Name: **Develon Hungary Szolgáltató Korlátolt Felelősségű Társaság**

Registered office: 1116 Budapest, Barázda utca 18. ground floor 106.

Branch office: HU-4400 Nyíregyháza, Vay Ádám körút 4-6. 1. floor. 14/A.

Company registration number: Cg. 01-09-936944

Registered and registered: Fővárosi Törvényszék Cégbírósága

Tax number: 22638380-2-43

E-mail address: [info@homeinfo.hu](mailto:info@homeinfo.hu)

Websites: [www.homeinfo.hu](http://www.homeinfo.hu)

Applications: iOS: <https://itunes.apple.com/hu/app/homeinfo-partner/id1434356425?l=hu&mt=8>

Android: <https://play.google.com/store/apps/details?id=homeinfo.hi.asl.com.homeinfo> Facebook: <https://hu-hu.facebook.com/Homeinfo.hu/>

Pinterest: <https://hu.pinterest.com/homeinfohu/>

YouTube: <https://www.youtube.com/user/HomeinfoHU>

Instagram: <https://www.instagram.com/homeinfo.hu/>

(as data controller, hereinafter referred to as **Homeinfo**)

**Data Protection Officer.**

**If you have any questions or comments about our processing or wish to exercise your rights, you can do so by sending an e-mail to the following address or by calling the following telephone number:**

e-mail: [info@homeinfo.hu](mailto:info@homeinfo.hu)

[+36 70 433 19 10](tel:+36704331910)

Name, address, and contact details of the hosting provider: PICMAC Ltd. (registered office: 4400 Nyíregyháza, Vay Ádám Boulevard 4-6. 1st floor, 114/A-B., contact: [attila.elekes@gmail.com](mailto:attila.elekes@gmail.com))

**Other data controllers:** Regarding point 10 (Data processing related to social media activity), the following individuals are also considered data controllers: Attila Elekes and Tamás Dévényi as private individuals and administrators of the closed Facebook group available at <https://hu-hu.facebook.com/Homeinfo.hu/>. Address: 1116 Budapest, Barázda Street 18, ground floor 106. Email: [info@homeinfo.hu](mailto:info@homeinfo.hu) Facebook contact: Tamás Dévényi

### CONTENT OF THE PRIVACY NOTICE

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The purpose of this privacy notice ("**Privacy Notice**") is to make you aware of what personal data we collect, use and safeguard in the course of our activities, how and for what purpose. **The Data Controller is hereinafter referred to as Homeinfo. Homeinfo** is committed to protecting and safeguarding your personal data. This Privacy Notice sets out **Homeinfo's** contact details as Data Controller, the scope of the personal data we process, the purposes for which we process personal data, the legal basis for the processing, the methods and duration of the processing, the data protection and security requirements, and your rights and means of redress for the protection of your personal data.

#### **What is personal data?**

Personal data is any information or piece of information relating to you as a natural person which makes it possible to identify you directly (e.g. by name) or indirectly (e.g. by means of a unique personal identifier). Your

personal data may include, for example, your first and last name, your home address, your email address, your IP address or the MAC address of your mobile device, or cookies placed on your device.

## CHANGES TO THE PRIVACY NOTICE

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**Homeinfo** reserves the right to amend this Privacy Notice unilaterally. If **Homeinfo**'s range of services expands in the future and the introduction of new services results in any changes to the collection or use of personal data, we will provide you with further information. Unless otherwise indicated, new or additional services will be subject to this Privacy Notice. If this Privacy Notice is amended, we will post the current Privacy Notice on our websites, apps and, if you have provided us with your email address, we will send it to the email address you have provided to us. In order to be informed of any changes or amendments, we recommend that you regularly check the **Homeinfo** websites, applications and the e-mail address you have provided to us.

## SCOPE OF PERSONAL DATA PROCESSED, PURPOSE, LEGAL BASIS AND DURATION OF PROCESSING

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The processing of data by **Homeinfo** when you use our websites and apps is mainly based on the fulfilment of your order as a contract or on your consent (e.g. when you subscribe to our newsletter), but in some cases we process personal data on the basis of law. Below is a summary table that provides important information about how we collect your personal data, the types of data we collect and why we use it, the legal basis for our processing and how long we keep your personal data for each processing purpose.

Please note that **Homeinfo** also uses **data processors** under contract with us in the course of its activities. In some cases, we also transfer and make your personal data available to other **data controllers**. In all cases, the activities of the processors or the scope of the data transferred will be the personal data indicated for the relevant processing. If the data concerned by the activities of the processors or the scope of the personal data transferred differs from these, we will indicate this separately. Processors and recipients of personal data as described above are bound by confidentiality and data protection obligations.

Please also note that personal data may be disclosed to additional recipients. In the event of a legal claim by you, **Homeinfo** or a third party, we may disclose data primarily to the competent court or other public authority (competent authority, law enforcement authorities, notary, tax authorities, etc.) or in response to a request from a court or other public authority. In the webshop, payment is possible via independent data controllers, the banks that carry out the transfer, **Homeinfo** does not pass on any data to anyone, you pass them on to the bank that carries out the transfer. Please note that if you use our social media platforms (e.g. like our Facebook page, follow us, comment on posts in Facebook groups, post), the social media platform provider will also process your data as a separate data controller. Your social media profile and posts will also be visible to people visiting our media platforms.

**Homeinfo** reserves the right to assign its receivables to a third party by way of assignment, in accordance with the rules of the Civil Code. The assignment shall change the identity of the creditor. In the event of an assignment, **Homeinfo** will transfer the data relating to the assigned debt to the person in the position of the assignee.

Pursuant to Section 5(5) of the Information Act, we will review the necessity of data processing required by a legal obligation every 3 years - unless the relevant legislation provides us with a data processing period or other review period. We will keep the documentation containing the circumstances and the results of the review for ten years after the review has been carried out, in accordance with the same legal provision.

## PARTNER REGISTRATION

*For what purposes do we process your personal data?*

The purpose of processing your data in the "Register as a Partner" section of [www.homeinfo.hu](http://www.homeinfo.hu) is to establish a partnership between you and Homeinfo, whereby you can advertise on the website or sell your product through us. The purpose of data processing is also to record, process and contact partner orders, to document the use of our services, to manage payment and warranty and guarantee. To issue invoices for purchases and services, to document the purchase and payment, and to fulfil accounting obligations concerning Homeinfo.

Which personal data we process:	On what basis we process this personal data (legal grounds):	For how long we process these personal data (duration of processing):
<p><b>Partner registration (on homeinfo.com):</b></p> <ul style="list-style-type: none"> <li>● email address</li> <li>● phone number</li> <li>● name</li> <li>● tax number</li> <li>● billing name and address</li> <li>● bank account number</li> <li>● contact name, telephone number, address and email address</li> <li>● package chosen</li> <li>● password</li> <li>● activities</li> <li>● website address</li> <li>● community page contact details</li> </ul>	<p>Processing of <b>supporting accounting documents</b> is based on a <b>legal obligation</b> (<i>Article 6(1)(c) GDPR</i>) pursuant to § 169 (1) and (2) of the Accounting Act and § 159 (1) and (2) of the VAT Act.</p> <p>The legal basis for the processing of <b>data beyond the data in the supporting documents for the accounting statements is the performance of the contract</b> between you and <b>Homeinfo</b> (<i>Article 6 (1) b) GDPR</i>)</p> <p>The legal basis for the processing of <b>Homeinfo contact details is the legitimate interest</b> of the business partner (<i>Article 6(1)(f) GDPR</i>).</p> <p>For the purpose of rapid and interactive contact, order processing and fulfilment. Weighing up your interests, rights and freedoms in the free disposal of your personal data, we determine that the processing of the data is necessary for the processing and fulfilment of the order. <b>Homeinfo</b> has chosen the least restrictive measures, taking into account cost-effectiveness. Safeguards: data security measures and the right of objection for you.</p> <p>If data are retained because of a <b>legal claim or the possibility of such a claim</b>, the data are also processed with regard to <b>Homeinfo's legitimate interest</b> in the effective enforcement of the claim (<i>Article 6(1)(f) GDPR</i>). In such a case, <b>Homeinfo</b> has a greater interest in asserting its rights or defending against a legal claim than the data subject's interest in the erasure of the personal data, taking into account that, if the data were erased, the data subject would not be able to assert his or her claim or defend against a claim or would find it significantly more difficult to do so.</p> <p><b>You may object to the processing of your data!</b></p>	<p>The accounting documents directly and indirectly supporting the accounting statements are kept for <b>8 years from</b> the date of issue, pursuant to Section 169 (2) of the Accounting Act.</p> <p>Data processing begins when the first personal data are transferred to <b>Homeinfo</b> for the purpose of concluding the contract (order) at the time of contact prior to the conclusion of the contract (order).</p> <p>Personal data that do not constitute supporting documents for accounting purposes are kept for <b>5.5 years</b> from the date of the order or the date of the warranty or, if for any reason, for 6 months from the end of the limitation period under civil law, in order to settle any disputes or claims, and are deleted after this period.</p> <p>We will keep data processed on <b>the basis of legitimate interest</b> until the interest has been established (for contact details, this means the time limits indicated above, and for processing for legal claims, until the end of the relevant proceedings, when we will review the processing) or <b>until we have dealt with your objection</b>, unless we are allowed to continue processing on the basis of our legitimate interests.</p>

**i** **OBJECTION:** You have the right to object to our processing (contact details, legal claims) based on legitimate interests at any time by sending an e-mail to Homeinfo at [info@homeinfo.hu](mailto:info@homeinfo.hu) or by sending a letter to our head office at the address indicated in the section entitled "Name and contact details of the controller".

***What happens if you do not provide the data?***

The email and telephone number or contact details, social platform contact details are used for contact purposes. If you do not provide these, we will not be able to contact you. If you do not tell us which package you are ordering from us, we will not be able to fulfil your affiliate registration or order. Providing this information is a prerequisite for the contract between you and **Homeinfo**. In turn, providing us with your activities and website will provide you with personalised content.

The above data will be deleted after a specified period of time.

The following persons are involved in the processing, fulfilment, payment, delivery and receipt of orders:

Name	Registered office	Purpose of the transfer, purpose of the transfer
Your <b>bank</b> and our account bank		processing of <b>payment (Independent data controller:</b> for payment, it processes your <b>name, bank, account number, time and amount of the transfer.)</b>
PICMAC Ltd.	4400 Nyíregyháza, Vay Ádám krt. 4-6. 1st floor. 114/A-B	hosting provider
National Tax and Customs Office	1054 Budapest, Széchenyi u. 2.	Compliance with the obligation to provide electronic data on the data of issued invoices pursuant to Act CXXVII of 2007
courier company		processes the data you have provided for the purpose of delivery in order to carry out the delivery
Accountant		accounting of data on orders
invoicing service provider		processes your invoice details to provide us with a billing system
mail service provider		provides us with the mail system
customer service		process your order
website management consultants		providing search engine optimisation

business consultants		strategic business advice
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### Prize draw

#### ***For what purposes do we process your personal data?***

In order to provide you with the opportunity to participate in a prize draw, and to increase our brand awareness and customer satisfaction.

**Homeinfo** hereby informs the User that, in connection with participation in the prize draw, it will provide the company providing the prize draw with the User's personal data as described in this section, with the User's consent, for the purpose of

- to receive a newsletter or information about a discount offer from the company concerned
- or to contact him/her in the event of his/her winning a prize in order to arrange for the prize to be transferred.

To this end, the participant in the prize draw gives his/her voluntary and informed consent to the processing of his/her identification data and personal data for the purpose of sending offers from these third parties contracted with **Homeinfo**. This consent may be withdrawn at any time.

Legal basis: the consent of the data subject - based on Article 6(1)(a) GDPR and Article 6(5) of Act XLVIII of 2008 on Economic Advertising.

<b>Which personal data we process:</b>	<b>On what basis we process this personal data (legal grounds):</b>	<b>For how long we process this personal data (duration of processing):</b>
<ul style="list-style-type: none"> <li>● Name</li> <li>● email address</li> <li>● phone number</li> <li>● Facebook profile, picture, username, email address</li> <li>● winners' address</li> </ul>	<p><b>Your consent</b> (Article 6(1)(a) GDPR) to be able to participate in the competition and for <b>Homeinfo</b> to process the personal data you have provided.</p> <p><b>Your consent to Homeinfo</b> contacting you with promotional offers, personalised offers for its own commercial purposes and by means of its newsletter on behalf of itself and its partners at the e-mail address or telephone number you have provided to receive the newsletter (e.g. <b>Article 6(1)(a) of the GDPR</b> and Article 6(5) of Act XLVIII of 2008 on Economic Advertising and Article 13/A(3) of Act CVIII of 2001 on Electronic Commerce.</p> <p><b>You are entitled to withdraw your consent at any time.</b> Withdrawal of consent does not affect the lawfulness of the processing prior to the withdrawal.</p>	<p>Unless <b>you request the deletion of your data</b>, but no later than 6 months after the end of the prize draw or, in the case of a prize, the end of the civil (criminal in the case of a criminal offence) limitation period, which is expected to be <b>5.5 years</b>, in order to settle any disputes, we will delete the data after the expiry of the time limit.</p> <p>Data processed on <b>the basis of legitimate interest will be</b> processed until the interest is lost (in the case of processing for legal claims, until the end of the relevant proceedings, when we will review the processing) or <b>until we have dealt with your objection</b>, unless we are allowed to continue processing on the <b>basis of</b> our legitimate interests.</p>

	<p>If <b>Homeinfo</b> retains the data for <b>the purposes of a legal claim or the possibility thereof</b> (beyond the limitation period or after the withdrawal of your consent), the data will also be processed with regard to <b>Homeinfo's legitimate interest in the effective exercise of the claim (Article 6(1)(f) GDPR)</b>. In such a case, <b>Homeinfo</b> has a greater interest in asserting its rights or defending against a legal claim than the data subject's interest in the erasure of the personal data, taking into account that, if the data were erased, it would be impossible or significantly more difficult for the data subject to assert its claim or defend against its claim.</p> <p><b>You may object to the processing of your data!</b></p>	
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**i** **OBJECTION:** You have the right to object to our processing (to lodge a legal claim) based on legitimate interests at any time by sending an e-mail to Homeinfo at [info@homeinfo.hu](mailto:info@homeinfo.hu) or by sending a letter to our head office at the address indicated in the section entitled "Name and contact details of the controller".

***What happens if you do not provide the data?***

Providing the data is voluntary. If you do not provide us with the data, you will not be able to participate in our prize draw.

You may request the deletion of your data at any time, either by sending a request to [info@homeinfo.hu](mailto:info@homeinfo.hu) or by using one of the contact details listed in the "Data controller's name and contact details" section. In this case, your relevant data will be deleted at the same time as they are processed. Withdrawal of consent shall not affect the lawfulness of the processing prior to its withdrawal.

***To whom do we transfer your personal data?***

The above data you have provided will be transferred to the following persons:

<b>Name</b>	<b>Address</b>	<b>Transfer of data, purpose of transfer</b>
Community platform provider		To enable the display of a prize draw
PICMAC Ltd.	4400 Nyíregyháza, Vay Ádám krt. 4-6. 1. floor. 114/A-B	hosting provider
courier service		prize delivery

**LINKS TO OTHER WEBSITES**

Please be informed that for your convenience and to provide you with more complete information, we have placed links and menu items to other websites and blogs. These websites and blogs **operate independently from Homeinfo** and have their own privacy policies and data management, over which we have no control. We

recommend that you also read the privacy policy of the linked websites or blogs when you visit them. We are not responsible for the content of the linked websites and blogs, their use or their privacy policies, **except where the linked website is also operated by Homeinfo.**

If you voluntarily consent to the sharing of your data on other websites, you acknowledge that these other websites are subject to their own privacy policies, for which **Homeinfo** is not responsible.

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### ACCEPTANCE OF THE PRIVACY STATEMENT

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If you use **Homeinfo's** websites and applications, you confirm that you have read, understood and accepted the contents of this Privacy Policy in full. When you decide to tick the box on the relevant interface confirming that you have read and understood the contents of the Privacy Notice, you accept **Homeinfo's** processing of your data in accordance with this Privacy Notice. If you do not agree with the contents of the **Homeinfo** Privacy Policy, please do not tick the relevant boxes and do not use the website or application.

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### ACCESS TO DATA, DATA SECURITY MEASURES

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**Homeinfo** will do its utmost to ensure the security of your personal data in accordance with Article 32 of the GDPR. **Homeinfo** will also take the necessary technical and organisational measures and establish the necessary rules of procedure to comply with the GDPR and other data protection and confidentiality rules.

**Homeinfo** guarantees an adequate level of data security in the following ways:

- Your data will be stored in a secure technical environment and will only be made available to authorised persons (our staff after proper identification),
- **Homeinfo** uses the https protocol for data management, so that you and the server communicate via an encrypted connection,
- natural persons who have access to personal data may process personal data only in accordance with the instructions of the controller,
- we ensure that the integrity of the data is verified,
- we protect your data from unauthorised access by applying security measures,
- we use encryption for the transmission of data by means of appropriate technical solutions,
- our security measures are regularly tested and evaluated and improved.

Your personal data processed by **Homeinfo** may be accessed by the following persons within the **Homeinfo** organisation, in accordance with the relevant internal procedures: administrators, IT staff, persons dedicated to the case.

**Data Incident:** in the event of an incident involving your data, **Homeinfo** will take all necessary measures to mitigate the risks as soon as it becomes aware of the incident. In the event of an incident involving your data which, despite the protection measures taken by **Homeinfo** (or its data processor), is likely to result in a high risk to your rights and freedoms, we will inform you and the competent authority of this incident without delay and free of charge.

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### DATA TRANSFERS TO THIRD COUNTRIES

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#### DATA TRANSFERS TO THIRD COUNTRIES

Transfers of personal data to third countries may take place if the third country provides an adequate level of protection. Such transfers do not require a specific authorisation.

Data are currently transferred to the following controllers, processors to the following third countries outside the EU and for the following purposes:

Name, location, country of data processor	Responsibility Decision- Article 45(1) GDPR	Country of transfer, place of establishment, purpose of processing
Google LLC 1600 Amphitheatre Parkway Mountain View, CA 94043. USA	Commission Implementing Decision 2016/1250 (EU) (USA - EU Privacy Shield List)	For the purpose of website traffic statistics
Tidio LLC., 180 Steuart St, CA 94119, San Francisco USA		Provision of website live chat

Those who receive personal data as described above are bound by confidentiality and data protection obligations.

### COOKIE

An anonymous user identifier (cookie) is a unique set of signals that service providers place on your device to identify you and store profile information. It is important to know that such a sequence of signals cannot identify you by itself, but can only recognise your computer. In the networked world of the Internet, personalised information and tailored service can only be provided if service providers can identify the habits and needs of their customers. Service providers are turning to anonymous identification to learn more about their customers' information usage patterns in order to further improve the quality of their services and to offer their customers customisation options.

**Disabling cookies:** if you do not wish to have such an identifier placed on your computer, you can configure your browser to disable unique identifiers or to allow only certain unique identifiers - however, in such cases, some of the services we provide on may not be available or may not be available as if you had enabled them.

**The cookies used on the Website are the following:**

COOKIE COOKIES.	EVIDENCE	TYPE	WHY WE USE IT	DESCRIPTION
PHPSESSID	Until browser is closed	own cookie	provide you with user browsing	a cookie that is essential for the website to work
homeinfo	Until browser is closed	own cookie	to allow you to browse between	cookie essential for website to work

			subpages of websites	
_goa3	10 year	third party cookie	display general advertising to you	advertising cookie
_goa3session	2 days	third party cookie	show general ads to you	advertising cookie
zona*	1 day	third party cookie	show general ads to you	advertising cookie
_ga	2 years	third party cookie	store your browsing time data to improve our services	convenience cookie
_gid	1 day	third party cookie	stores your browsing time data to improve our services	convenience cookie
_hjIncludedInSample	Until browser is closed	third party cookie	stores clicks, page views data to improve our services	convenience cookie
SL_C_*	1 month	third party cookie	stores clicks, page views data to improve our services	convenience cookie

referrer	Until browser is closed	own cookie	generate page statistics	convenience cookie
arrival_url	Until browser closes	own cookie	create page statistics	comfort cookie
hi-cookie-consent	8 years	own cookie	Track acceptance of cookie policy	comfort cookie
snapped this	Close browser	own cookie	create page statistics	comfort cookie
clicked_rooms	1 month	own cookie	Webshop product recommendation for you	comfort cookie
onnekAjanljuk	1 month	own cookie	Recommend content to you in the Knowledge Base	comfort cookie
onnekAjanljukINSP	1 month	own cookie	Recommend a picture to you in the inspiration library	comfort cookie
user input cookie			remember the information you enter in the form so you don't have to enter it again	convenience cookie

SI_bye_time	3 hours	your own cookie	show general ads in pop up window	comfort cookie
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ba_vid	1,5 years	Barion Payment Inc.	Helps detect fraud in online payments	essential
ba_vid.xxx	1.5 years	Barion Payment Inc.	Essential to detect fraud in online payments	essential
ba_sid	30 minutes	Barion Payment Inc.	Essential for fraud detection in online payments	essential
ba_sid.xxx	30 minutes	Barion Payment Inc.	Essential for fraud detection in online payments	essential

BarionMarketing Consent.xxx	1.5 years	Barion Payment Inc.	Consent to marketing cookies	for marketing purposes
Media and advertising partners cookies	variable	Barion Payment Inc.	<a href="https://www.barion.com/hu/suti-tajekoztato/">https://www.barion.com/hu/suti-tajekoztato/</a>	for marketing purposes

**1. Google traffic cookies** - used by Google to monitor Google traffic

The websites use Google Analytics by Google LLC ("Google") to analyse their traffic. The Google Analytics system stores cookies, small text files, on your device and uses them to analyse website traffic. Your browsing habits and your IP address are transmitted to Google servers in the USA. Google will use this data to compile reports for **Homeinfo**. Users who do not want Google Analytics to generate a report on their visit can install a browser extension to block Google Analytics. This add-on instructs the Google Analytics JavaScript scripts (ga.js, analytics.js, and dc.js) to stop sending visit information to Google. In addition, users who have installed the disabling browser extension will not be included in the content experiments. If you do not want Google Analytics to track you on our websites, you can download it from [tools.google.com/dlpage/gaoptout](https://tools.google.com/dlpage/gaoptout).

**2. Session cookies are deleted at the end of the session:**

These cookies are essential for navigating our websites, for key features to work and for accessing protected content. These cookies are used to store the products you select in the webshop and do not collect any information about you that could be used to identify you, be used for marketing purposes or remember what other websites you have visited. When you close the website, these cookies are automatically deleted and the session is closed.

Such cookies are PHPSESSID and hominfo cookies.

A cookie for managing our current actions, usually displayed in a pop-up window, which stores information about whether the window should be displayed to you or has already been displayed. An example of a cookie is a cookie for a cookie label.

### 3. Third party targeted advertising or visitor behaviour cookie

We display various content on our websites through third-party web services, which may result in the storage of some cookies that are not under our control, so we have no control, by definition, over what information these websites or external domains collect about how you use this embedded content.

Facebook and Google use such cookies on our website, which process data for dynamic remarketing purposes. Such cookies are also cookies from Adverticum Zrt.'s ad serving system. These cookies store information about the products you have viewed on our website, which is used to advertise the same product to you on an off-site advertising platform. The data is sent to Facebook, Google, Adverticum Zrt, Barion, who provide us with the cookie.

Some cookies also give us a picture of your website behaviour so that we can improve our services. Examples include \_hjIncludedInSample and SL\_C\_\* cookies.

### 4. Statistical convenience cookies

These cookies store statistical information about your visit so that we can improve our services. We use other cookies to offer you content. These include the onnekAjanljuk cookie.

## PROFILE PHOTO

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**Please note that we carry out profiling in the course of our data processing as described below.**

**Social Platforms.** Please note again that the data processing and possible profiling of these social media platforms is governed by their own data processing policies, for which we are not responsible.

**Google Analytics:** we use Google Analytics on our websites.

Google's information about the service. Google Analytics mainly uses internal cookies to compile reports on user interactions with Google Analytics clients' websites. Google Analytics advertising features can be enabled through Google advertising cookies, such as remarketing, for Google Display Network products such as AdWords.

**For information on privacy settings and how to disable cookies,** please visit <https://support.google.com/analytics/answer/6004245?hl=hu>. Each computer and device that connects to the internet is assigned a unique number, called an IP address (Internet Protocol address). Such numbers are allocated in blocks by country, and an IP address can often be used to identify the country, state/county and city from which the computer connects to the internet. Because of the way the internet works, websites use IP addresses, website owners can learn the IP address of their users even if they do not use Google Analytics. However, Google Analytics collects the IP addresses of website users only to protect the security of the service and to allow website owners to build up a picture of where their visitors come from around the world (also known as 'IP geolocation'). Google stores the data in a performance-optimised, encrypted format rather than in traditional file systems or databases. To make data more difficult to access and to reduce redundancy, it distributes data across multiple physical and logical volumes to prevent misuse. Google applications run in a distributed environment across multiple locations. Rather than keeping each customer's data separate on a single machine or group of machines, it stores data for all Google customers (customers, businesses and even

Google's own data) in a mixed, distributed infrastructure of many homogeneous Google machines housed in Google's data centres. **For more information on Google's privacy policy, please visit <https://policies.google.com/privacy?hl=hu>**. Lehetősége or to opt-out of future Google Analytics tracking by downloading and installing the Google Analytics Opt-out Browser Addon to your current browser: [tools.google.com/dlpage/gaoptout](https://tools.google.com/dlpage/gaoptout).

Remarketing. This means that it stores data on the products you have viewed on our website, based on which it advertises the same product to you on an off-site advertising platform. The data is sent to the cookie provider (Facebook, Google, Adverticum Zrt.) who provide the cookie to us. You can disable cookies through your browser settings.

Some of the convenience cookies we use analyse your clicks and movements on our website to improve our services. You can disable these cookies through your browser settings.

## YOUR RIGHTS AND MEANS OF REDRESS

You have the following rights in relation to your personal data processed by **Homeinfo**:

1. Right of access
2. Right of access to your personal data
3. Right to access your personal data
4. Right to rectification Right to rectification
5. Right to rectification Right to rectification Right to block access
6. Right to object
7. Right to withdraw consent

### 1. RIGHT OF ACCESS

You have the right to receive feedback on whether your personal data are being processed and, in this context, to request information on what data **Homeinfo** processes about you, the category of personal data that these data belong to, the purposes for which they are processed and for how long and to whom they are disclosed (category of recipients, including in particular recipients in non-EU Member States). Under this right, you may also be informed of your rights in relation to the controller, in particular to request their erasure, restriction of processing, rectification of your personal data and to object to the processing of your personal data. In this context, you also have the right to lodge a complaint with the supervisory authority (National Authority for Data Protection and Freedom of Information). If you have not provided your data, you may also request information about the source of the data.

### 2. RIGHT TO RECTIFICATION

If your data has changed or has been incorrectly recorded, you may request that your data be corrected, rectified or clarified. If your data is incomplete, you may also request that it be completed by means of a supplementary declaration.

### 3. RIGHT TO ERASURE

You may request that we delete your personal data under the following conditions:

- the personal data are no longer necessary for the purposes for which they were collected or processed
- you withdraw your consent on which the processing is based and there is no other legal basis for the processing
- you object to the processing and there is no overriding legitimate ground for the **processing**
- the personal data have been unlawfully **processed**

- the data must be erased in order to comply with a legal obligation
- in relation to services offered directly to children.

Where **Homeinfo** has disclosed the personal data, we will take reasonable steps to inform other data controllers that have processed the data that you have requested them to delete the links to or copies or replicas of the personal data in question.

Please note that we will not be able to comply with your request for erasure if the data are necessary for the establishment, exercise or defence of legal claims or if we would restrict your right to freedom of expression and information or if we are subject to a legal obligation (or a legal obligation imposed on us by a legal obligation in the public interest or for scientific, research or statistical purposes) which is contrary to the erasure request.

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#### 4. RIGHT TO RESTRICTION OF PROCESSING

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You may request that we restrict processing in the following cases:

- You believe that the data are inaccurate, in which case the restriction applies for the period during which we verify the accuracy of the personal data
- the processing is unlawful, but you oppose the erasure of the data and instead request the restriction of their use
- we no longer need the personal data, but you require them for the establishment, exercise or defence of legal claims
- if you object to the processing, in which case the restriction will apply for a period of time until it is determined whether our legitimate grounds override your legitimate grounds

Where processing is subject to restriction, personal data other than storage may be processed only with the consent of the data subject or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for important public interests of the Union or of a Member State.

Rectification, erasure or restriction of processing will be communicated to all those to whom we have disclosed the personal data, unless this proves impossible or involves a disproportionate effort. You can obtain a list of such recipients upon request.

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#### 5. RIGHT TO DATA PORTABILITY

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You have the right to obtain the personal data that we process, to have that data transferred to another controller or to have **Homeinfo** transfer that data to another controller designated by you, if the processing is based on your consent or the performance of a contract and is automated. The transfer must not infringe the rights and freedoms of others or the right to erasure (right to be forgotten).

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#### 6. RIGHT TO OBJECT

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Where the processing of your data is based on a legitimate interest of **Homeinfo** or a third party or is carried out in the public interest or in the exercise of official authority, you have the right to object to this processing, including profiling. **Homeinfo** will carry out profiling as described in the **PROFILING** section above. In such cases, we will no longer process your personal data unless the processing is justified by compelling legitimate grounds which override your interests, rights and freedoms or is necessary for the establishment, exercise or defence of legal claims. Where your personal data is processed for direct marketing purposes, you have the right to object at any time to the processing of personal data relating to you for such purposes, including profiling, and we may no longer process the data after you have objected.

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#### 7. RIGHT TO WITHDRAW CONSENT

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You have the right to withdraw your consent at any time. Withdrawal of consent does not affect the lawfulness of the processing based on consent prior to its withdrawal.

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## HOMEINFO'S PROCEDURE TO ENSURE THE ABOVE RIGHTS

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**Homeinfo** will inform you without undue delay, and in any event within one month of receiving your request, of the action taken in response to your request or the reasons for not taking action. If the request is complex or if a large number of requests are received, the time limit may be extended by a further two months. Information will be provided electronically where possible. Information and action will be provided free of charge, except for requests which are clearly unfounded or excessive, in particular because of their repetitive nature. In such cases, we will charge a reasonable fee or refuse to take the requested action. We may ask you for information necessary to confirm your identity in connection with your request. We will also provide you with a copy of the personal data we hold about you free of charge in the first instance, and charge a fee equal to the administrative costs for any further copies.

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## ENFORCEMENT OF RIGHTS RELATING TO PERSONAL DATA AFTER THE DEATH OF THE DATA SUBJECT

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**Within five years** after the death of the data subject, the person authorised by the data subject to exercise the rights concerning the data of the deceased person, by means of an administrative act or a declaration in a public or private document with full probative value made at **Homeinfo**, may exercise the following rights in relation to the data of the deceased person: access, rectification, erasure, restriction and objection. If the data subject has made more than one declaration, the declaration made at a later date may be used to exercise the rights. If the data subject has not made an administrative provision or a relevant declaration **to Homeinfo, the next of kin of the** first person to contact **Homeinfo**, as defined in the Civil Code, has the right to request rectification or object to the processing and, if the processing was unlawful during the data subject's lifetime or the purpose of the processing ceased to exist upon the death of the data subject, the right to request the erasure or restriction of the deceased's data **within five years of** the death of the data subject. **Homeinfo** will inform the next of kin of the measures taken upon request, unless the data subject has prohibited it.

The person exercising the rights of the data subject must provide **Homeinfo** with proof of the fact and date of death of the data subject by means of a death certificate or court order, and proof of his or her identity and status as a close relative by means of a public document, as required by law.

**You have the following rights of enforcement and remedies in relation to the processing of your personal data by Homeinfo:**

1. Right to complain
2. Right to judicial remedy
3. Right to judicial redress

You may seek legal redress from the courts, including judicial remedies, in accordance with the GDPR and the **Civil Code**.

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### 1. COMPLAINT

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You have the right to lodge a complaint about our processing with the supervisory authority if you believe that our processing is not in accordance with the law. [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu) The supervisory authority in Hungary is the Hungarian National Authority for Data Protection and Freedom of Information, with its registered office at 9-11 Falk Miksa Street, 1055 Budapest, Hungary, website: [www.naih.hu](http://www.naih.hu), telephone number: +36 (1) 391-1400.

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### 2. Right to apply to the courts

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You have the right to go to court:

- against a binding decision of the supervisory authority which applies to you
- in the event that the supervisory authority does not deal with your complaint, rejects your complaint as justified or does not inform you at all within three (3) months of the outcome of your complaint
- if **Homeinfo** does not act on your request without delay and at the latest within one month of receiving it
- without prejudice to your right to lodge a complaint, if you consider that your rights under the Regulation have been infringed as a result of processing not in compliance with the GDPR.

The Hungarian courts have jurisdiction to bring proceedings against the supervisory authority, but proceedings against **Homeinfo** may also be brought before the court of the place where **Homeinfo** is established or before the court of the place where you reside/ habitually reside.

### 3. Right to compensation

If you have suffered pecuniary or non-pecuniary damage (damages) as a result of a breach of the GDPR, you are entitled to compensation for the damage suffered, from the controller (**Homeinfo**) or the processor. **Homeinfo** or the processor shall be exempt from liability if it proves that it is not in any way responsible for the event giving rise to the damage. Such proceedings may be brought before the court in the place where **Homeinfo** is established or the court in the place where you reside/ habitually reside.

Please note that, as a general rule, these property actions can be brought before the courts, which are also the courts for actions for damages or compensation for the exercise of official authority. By way of derogation from the general rule, property lawsuits the value of the subject matter of which does not exceed HUF 30 million or in which the value of the claim cannot be determined fall within the jurisdiction of the district court.

#### LEGAL BASIS FOR DATA PROCESSING

**Homeinfo** processes your personal data on the basis of the following legislation:

1. **REGULATION (EU) No 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL** of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Regulation (EC) No 95/46/EC ("**GDPR**")
2. Act CXII of 2011 on the Right of Informational Self-Determination and Freedom of Information ("**Information Act**")
3. Act XLVIII of 2008 on the Fundamental Conditions and Certain Restrictions on Economic Advertising Activities ("**Act XLVIII**")
4. Act CXIX of 1995 on the Processing of Name and Address Data for Research and Direct Marketing Purposes ("**DM Act**")
5. Act V of 2013 on the Civil Code ("**Civil Code**")

#### DATA PROTECTION CONTACT

To assist you in making decisions about data processing and to safeguard your rights, you can contact **Homeinfo's** designated data protection contact person at [info@homeinfo.hu](mailto:info@homeinfo.hu) or by [phone +36 70 433 19 10](tel:+36704331910) between 8 a.m. and 5 p.m., Monday to Friday.

#### APPLICABLE LAW AND OTHER PROVISIONS

This Privacy Notice is governed by Hungarian law.

If the law in force in your country imposes more stringent rules on the parties than those set out in this Privacy Notice, you shall comply with them. You acknowledge and agree, however, that **Homeinfo's** liability is based on the law applicable to this Privacy Notice and excludes its liability to the fullest extent possible under applicable law and court decisions for non-compliance with the provisions of the User's country.

The headings in this Privacy Notice are for information purposes only and are not in themselves sufficient for an understanding of the processing.

If you have any questions that are not clearly answered in this Privacy Notice, please contact [info@homeinfo.hu](mailto:info@homeinfo.hu).