

**Information on the processing of personal data by Polus Társasház Üzemeltető Kft.**

**Introduction**

Below you will find information on the processing of your personal data by **Polus Társasház Üzemeltető Kft.**, Corporate ID No. 01-09-960146, with its registered office at 1152 Budapest, Szentmihályi út 131. operating the Pólus Shopping Centre (hereinafter the “**Company**”) provided in accordance with Regulation (EU) 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 (hereinafter the “**GDPR**”) and related applicable data protection legislation.

The Company, as a controller of your personal data, determines the means and purposes of the processing of your personal data as specified below in this document. With regard to the processing of personal data, you can also exercise the below-mentioned rights towards the Company.

You can contact the Company in writing at the address 1152 Budapest, Szentmihályi út 131., by phone at +36-1-225-6600, or via email at [hungary@cpipg.com](mailto:hungary@cpipg.com).

You can contact the Company’s Data Protection Officer via email at [dpo@cpipg.com](mailto:dpo@cpipg.com).

**Processing of your personal data**

The Company processes your personal data only to the necessary extent and for the period necessary to achieve a specific purpose on a lawful basis.

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

- Lawful basis for processing of your personal data for the given purpose;
- Extent of processing;
- Source of the personal data;
- Information on who can obtain access to your personal data; and
- Information on how long the Company will store your personal data.

In case your personal data are processed on the lawful basis of legitimate interest of the Company or a third party, information on the nature of this legitimate interest is also included.

**1. Camera surveillance**

<b>Purpose of the processing</b>	<b>Operation of camera surveillance</b>
Description of the purpose of the processing	The Company is operating a camera surveillance system within the territory of Pólus Shopping Centre located at 1152 Budapest, Szentmihályi út 131. owned by the Company (the “ <b>Shopping Centre</b> ”), as well as the parking area of the Shopping Centre for the protection of the Shopping Centre, as well as the visitors and tenants of the Shopping Centre on the basis of Act CXXXIII of 2005 on the personal and property protection, as well as private investigation activity (the “ <b>Act</b> ”). The location of the cameras is indicated in <u>Annex No. 1</u> of this memorandum.
Lawful basis	The legitimate interest of the Company for the protection of the Shopping Centre owned by the Company, as well as the visitors and tenants of the Shopping Centre (GDPR Article 6 paragraph (1) subparagraph f)).
Category of personal data	Image of the data subject

Source of personal data	Natural person entering the premises of the Shopping Centre (including the parking area of Shopping Centre) (data subject)
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Recipients of personal data	<p>KONA-SEC Kft. (registered seat: 1211 Budapest, Weiss Manfréd út 5-7.; e-mail: info@konasec.hu) as the security company acting on the basis of the service agreement concluded with the Company and as the security guard under the Act is entitled to view, have access to the recording taken of the data subject as data processor.</p> <p>CPI Hungary Kft. (registered seat: 1138 Budapest, Dunavirág utca 2-6. Gateway Office Park, 3<sup>rd</sup> tower, 4<sup>th</sup> floor; e-mail: hungary@cpig.com) is entitled to view, have access to the recording taken of the data subject on the basis of the engagement agreement concluded with the Company as the data processor operating the Shopping Centre.</p> <p>Persons with legitimate interest shall be entitled to view, have access to the recording taken of the data subject.</p>
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Storage period of personal data	7 days from the recording.
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## 2. Complaint handling

### Purpose of the processing

### Handling of customer complaints

Description of the purpose of the processing	The Company ensures to its visitors in connection with Pólus Shopping Centre located at 1152 Budapest, Szentmihályi út 131. owned by the Company (the “Shopping Centre”) to make their comments, complaints towards the Company in person in the form of a protocol recorded via the security company in the Shopping Centre or online (e-mail to be sent to polus@cbre.com).
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Lawful basis	The freely given, specific, informed and unambiguous consent of the data subject (GDPR Article 6 paragraph (1) subparagraph a)) at the time when complaint was made to allow the Company to process the personal data of the data subject for complaint handling, answering complaints and keeping contact.
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Category of personal data	The name, address, phone number, e-mail address of the data subject
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Source of personal data	All those data subjects who submit their complaints to the Shopping Centre in person or in an electronic way.
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Recipients of personal data	The Company sends the personal data of the data subject to CPI Hungary Kft. (registered seat: 1138 Budapest, Dunavirág utca 2-6. Gateway Office Park, 3 <sup>rd</sup> tower, 4 <sup>th</sup> floor; e-mail: hungary@cpig.com), its data processor for the all-round handling of the complaint
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received (receiving, recording, processing, evaluating, internal assessing of the lawfulness of, accepting or rejecting the complaint, furthermore communicating the result of the assessment and making measures to avoid the same case in the future).

Storage period of personal data	Until the data subject withdraws his/her consent, but no later than 30 days calculated from the closing of the management of the complaint.
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### 3. Processing of photo-, video recordings taken at event, promotion in the Shopping Centre

Purpose of the processing	Processing of photo-, video recordings taken at event, promotion
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Description of the purpose of the processing	The Company occasionally organizes events, promotions (together the “Events”) for the visitors of Pólus Shopping Centre located at 1152 Budapest, Szentmihályi út 131. owned by the Company (the “Shopping Centre”). During the Events photos, video recordings are taken (together the “Recordings”). The Recordings are used by the Company for marketing purposes to promote the Shopping Centre. Image of the persons attending the Events are recorded on the Recordings.
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Lawful basis	The freely given, specific, informed and unambiguous consent of the data subject (GDPR Article 6 paragraph (1) subparagraph a)). By attending the Events, the data subject consents to the processing of his/her personal data for the purpose defined above.
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Category of personal data	Image of the data subject
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Source of personal data	Natural persons attending the Events (data subject)
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Recipients of personal data	CPI Hungary Kft. (registered seat: 1138 Budapest, Dunavirág utca 2-6. Gateway Office Park, 3 <sup>rd</sup> tower, 4 <sup>th</sup> floor; e-mail: hungary@cpipg.com), data processor of the Company has access to the personal data of the data subject.
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Storage period of personal data	Until the data subject withdraws his/her consent, but no later than 5 years from taking the Recording.
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### 4. WIFI

Purpose of the processing	Statistical data
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Description of the purpose of the processing	The Company ensures for the visitors of Pólus Shopping Centre located at 1152 Budapest, Szentmihályi út 131. owned by the Company (the “Shopping Centre”) to use the WIFI network of the Shopping Centre (the “Network”) free of charge. Use
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of the Network requires registration, personal data of registered users are used for statistical purposes (in particular for the assessment of visitor mix) by the Shopping Centre.

Lawful basis	The freely given, specific, informed and unambiguous consent of the data subject (GDPR Article 6 paragraph (1) subparagraph a)) to the processing of the personal data provided when registration is made at the time of connecting to the Network for the purpose specified above.
Category of personal data	Name, e-mail address of the data subject
Source of personal data	All those data subjects, who registered themselves in order to use the Network.
Recipients of personal data	<p>The Company sends the personal data of the data subject to CPI Hungary Kft. (registered seat: 1138 Budapest, Dunavirág utca 2-6. Gateway Office Park, 3<sup>rd</sup> tower, 4<sup>th</sup> floor; e-mail: hungary@cpig.com), data processor of the Company to perform statistical analysis.</p> <p>Personal data of the data subject are stored and sent to the Company by ACE TELECOM Kft. (registered seat: 1037 Budapest, Zay utca 3.; phone: +36-1-437-0590; e-mail: office@acetelecom.hu), data processor of the Company.</p>
Storage period of personal data	Until the data subject withdraws his/her consent, but no later than 5 years from the registration of the data subject.

**5. Contact option on [www.polus-center.hu](http://www.polus-center.hu)**

<b>Purpose of the processing</b>	<b>Handling of visitor requests made via the webpage</b>
Description of the purpose of the processing	Replying to the requests received via the contact option on the <a href="http://www.polus-center.hu">www.polus-center.hu</a> webpage of Pólus Center Shopping Centre located at 1239 Budapest, Bevásárló utca 4. owned by the Company (the "Shopping Centre").
Lawful basis	The freely given, specific, informed and unambiguous consent of the data subject (GDPR Article 6 paragraph (1) subparagraph a)). By sending the request, the data subject consents to the processing of his/her personal data.
Category of personal data	Name, e-mail address, phone number (if provided by the data subject)
Source of personal data	Request sent by the data subject via the contact option on the <a href="http://www.polus-center.hu">www.polus-center.hu</a> webpage

Recipients of personal data	The Company sends the personal data of the data subject to CPI Hungary Kft. (registered seat: 1138 Budapest, Dunavirág utca 2-6. Gateway Office Park, 3 <sup>rd</sup> tower, 4 <sup>th</sup> floor; e-mail: hungary@cpipg.com), data processor of the Company to reply to visitor requests.
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Storage period of personal data	For 30 days after replying the request.
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**6. Sending of newsletters**

**Purpose of the processing**

**Sending of newsletters**

Description of the purpose of the processing	The Company wishes to inform interested parties of the events taking place in Pólus Center located at 1239 Budapest, Bevásárló utca 4. owned by the Company (the " <b>Shopping Centre</b> ") of products and promotions that positively affect the interests of customers by sending newsletters related to the Shopping Centre as well as current news (collectively, the " <b>Newsletter</b> ").
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Lawful basis	The freely given, specific, informed and unambiguous consent of the data subject (GDPR Article 6 paragraph (1) subparagraph a)).
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Category of personal data	Name and e-mail address of the data subject.
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Source of personal data	All those data subjects who have given their consent for the Company to send them a Newsletter via e-mail.
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Recipients of personal data	The Company sends the personal data of the data subject to CPI Hungary Kft. (registered seat: 1138 Budapest, Dunavirág utca 2-6. Gateway Office Park, 3 <sup>rd</sup> tower, 4 <sup>th</sup> floor; e-mail: hungary@cpipg.com), data processor of the Company for sending newsletters to recipients.
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The Company sends the personal data of the data subject to BeDigital Kft. (registered seat: 1144 Budapest, Kerepesi út 96. 6/26.; phone: +3630-548-3085, e-mail: info@bedigital.hu), data processor of the Company for sending newsletters to recipients.

Storage period of personal data	For 30 days after replying the request.
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**7. Dietetic counseling - Facebook**

**Purpose of the processing**

**Dietetic counseling**

Description of the purpose of the processing	The Company, as the owner of Pólus Center (the " <b>Shopping Centre</b> ") located at 1152 Budapest, Szentmihályi út 131, strives to provide the Shopping Center's customers with the most complete range of services possible, and to this end, it wishes to organize free dietary counseling for the Shopping Center's customers by an expert involving (the " <b>Consultation</b> "). On the Shopping Center's Facebook page
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(<https://www.facebook.com/poluscenterbp>; the "Page"), the Company provides visitors to the Site with the opportunity to book an appointment with an expert under a contractual relationship with the Company as part of the Consultation (the "Booking"). Booking is made through the Site. After selecting the desired date, the data subject can enter their phone number and other data, and after clicking the "book date" button, the data subject consents to the sharing of the name of the data subject from the public data on their Facebook profile with the Company. The Company sends the name of the person concerned to the expert providing the Consultation. Beyond this, the Company does not manage any additional health data, especially those relating to the person concerned, they are recognized only by the consulting expert as an independent data controller.

Lawful basis	The freely given, specific, informed and unambiguous consent of the data subject to receive Newsletter from the Company (GDPR Article 6 paragraph (1) subparagraph a)).
Category of personal data	The Facebook name of the data subject
Source of personal data	All those data subjects who, by clicking on the "reserve an appointment" button on the Website, gave their consent for the Company to book an appointment for them with the consulting expert.
Recipients of personal data	<p>The Company sends the personal data of the data subject to CPI Hungary Kft. (registered seat: 1138 Budapest, Dunavirág utca 2-6. Gateway Office Park, 3rd tower, 4th floor; e-mail: hungary@cpipg.com), data processor of the Company to reply to visitor requests.</p> <p>The Company sends the personal data of the data subject to Brightly Kommunikációs Ügynökség Kft. (registered seat: 2724 Újlengyel, Ady Endre utca 41., phone: 06-1-264- 2090, e-mail: brightly@brightly.hu), data processor of the Company to reply to visitor requests.</p> <p>The Company will hand over the personal data of the person concerned to Bettina Budai, the consulting expert.</p>
Storage period of personal data	Within 30 (thirty) days after the date of the Reservation.

**8. Dietetic counseling - Website**

**Purpose of the processing**

**Dietetic counseling**



Description of the purpose of the processing

The Company, as the owner of Pólus Center (the "**Shopping Centre**") located at 1152 Budapest, Szentmihályi út 131, strives to provide the Shopping Center's customers with the most complete range of services possible, and to this end, it wishes to organize free dietary counseling for the Shopping Center's customers by an expert involving (the "**Consultation**"). On the website of the Shopping Center ([www.polus-center.hu](http://www.polus-center.hu); the "Site"), the Company provides visitors to the Site with the opportunity to book an appointment with an expert under a contractual relationship with the Company as part of the Consultation (the "Reservation"). Booking is made through the Site. After selecting the desired time, to complete the Reservation, the person concerned must enter his e-mail address in order to be in contact with the Reservation, and he can optionally enter his phone number and other data. In order for the Reservation to be fulfilled, the person concerned must accept this information. After clicking the "Next" button, the reservation is completed. The Company sends the name of the person concerned to the expert providing the Consultation. Beyond this, the Company does not manage any additional health data, especially those relating to the person concerned, they are recognized only by the consulting expert as an independent data controller.

Lawful basis	The freely given, specific, informed and unambiguous consent of the data subject to receive Newsletter from the Company (GDPR Article 6 paragraph (1) subparagraph a)).
Category of personal data	Name, e-mail address and, if provided, telephone number of the data subject, as well as other data provided by them
Source of personal data	All those data subjects who, by clicking on the "reserve an appointment" button on the Website, gave their consent for the Company to book an appointment for them with the consulting expert.
Recipients of personal data	<p>The Company sends the personal data of the data subject to CPI Hungary Kft. (registered seat: 1138 Budapest, Dunavirág utca 2-6. Gateway Office Park, 3rd tower, 4th floor; e-mail: <a href="mailto:hungary@cpipg.com">hungary@cpipg.com</a>), data processor of the Company to reply to visitor requests.</p> <p>The Company sends the personal data of the data subject to Brightly Kommunikációs Ügynökség Kft. (registered seat: 2724 Újlengyel, Ady Endre utca 41., phone: 06-1-264- 2090, e-mail: <a href="mailto:brightly@brightly.hu">brightly@brightly.hu</a>), data processor of the Company to reply to visitor requests.</p>

The Company will hand over the personal data of the person concerned to Bettina Budai, the consulting expert.

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Storage period of personal data	Within 30 (thirty) days after the date of the Reservation.
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#### **Transfers of your personal data to third countries or international organisations**

The Company or the recipients to which the Company gives access to your personal data for the above stated purposes will not transfer your personal data to any third countries or international organisations.

#### **Automated decision-making**

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

The Company or the recipients to which the Company gives access to your personal data for the above stated purposes will not use your personal data for automated decision-making.

#### **What are your rights with respect to the processing of personal data?**

With respect to the processing of your personal data by the Company, you can request the Company:

- To give you access to your personal data, whereby you can obtain, in particular, information whether your personal data are processed, for what purpose, what is the scope of processed data and who has been given access to your personal data, if relevant. You can also be provided with a copy of your personal data undergoing processing;
- To rectify inaccurate or incorrect data or to complete incomplete personal data;
- To erase the personal data, e.g. if the purpose of processing ceases to apply or if your personal data are processed unlawfully;
- To restrict the processing of your personal data;
- To data portability, which allows you to obtain personal data concerning you, which you have provided to the Company, in a structured and machine-readable format either for yourself or for another controller; and
- To make sure that you are not subject to any automated decision-making (you found out whether such decision-making takes place or not in the preceding chapter).

You can also raise an objection against the processing of your personal data, should the processing of your personal data be based on the lawful basis of legitimate interest, or to lodge a complaint with the Office for Personal Data Protection. The contact details are as follows:

#### **Hungarian National Authority for Data Protection and Freedom of Information**

1055 Budapest, Falk Miksa utca 9-11.

Tel.: +36-1-391-1400

[www.naih.hu](http://www.naih.hu)

[ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)

#### **How you can exercise your rights?**

You can request the exercise of your rights via a written or oral request. In order to provide sufficient protection of the personal data processed by the Company and to prevent personal data misuse from taking place, the Company has introduced rules for the verification of your identity stated below.

You may request the exercise of your rights by:

##### Written request

To request the exercise of the particular right in writing, please fill in the request form available at [www.cpigroup.hu/pdf/gdpr\\_hu.pdf?v071](http://www.cpigroup.hu/pdf/gdpr_hu.pdf?v071) (CPI Property Group, Group Data Protection Policy, Appendix 2). Your signature on the request form needs to be officially certified. Depending on local law, you may be able to have your signature certified e.g. at a notary office, post office, attorney-at-law, consulate or municipal/regional authority. The



signature has to be officially certified in a country where the request is submitted to the given CPIPG company in person (e.g. in hotel, office or other premises designated by the Company) or sent via mail using a postal services provider. In case of sending the request via mail using a postal service provider in the countries outside of the EEA or the European Union, you may be contacted by the Company in order to further verify your identity.

#### Oral request

You may also request the exercise of the particular right in person at the Company's registered seat. Your identity will be verified by the Company's designated employee (e.g. at a front desk), based on the submission of one of the following documents: personal ID card, passport or other document with a photo sufficiently eligible to enable your clear identification.

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

Please note that should your requests be manifestly unfounded or excessive, in particular because of their repetitive character, the Company may require a reasonable fee, not exceeding the necessary costs of the provision of the above stated information or arranging the exercising of your rights, for the purposes of responding to your request.

#### **Is the provision of your personal data mandatory?**

If the Company processes your personal data based on your consent, the processing of such data is voluntary. In this case, you are not required to grant your consent and provide your personal data to the Company.

Your consent to the processing of your personal data must be a freely given, specific, informed and unambiguous expression of your will, whereby you give the Company your permission, in the form of a statement or another evident confirmation, to process your personal data.

The Company may process your personal data based on a different lawful basis, e.g. lawful basis of performance of a contract, of compliance with a legal obligation or for purposes of the legitimate interest. In this situation, provision of your personal data is necessary, because, the Company may need such personal data e.g. to conclude and perform a contract with you or to meet legal obligations. If you decide not to provide the personal data to the Company, it would not be possible to conclude the contract or to fulfil the given legal obligations.

#### **How and when can you withdraw your consent to personal data processing?**

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

You may withdraw your consent:

- Electronically via email at [hungary@cpipg.com](mailto:hungary@cpipg.com); or
- In writing at the following address:  
1138 Budapest, Dunavirág utca 2-6., Gateway Office Park, Tower No. 3, 4<sup>th</sup> floor

The withdrawal of your consent shall have no impact on the processing of your personal data conducted before the withdrawal.

Annex No. 1

Location of cameras

