

Privacy Notice

PUBLISHER

Dohány Residence Kft.

EFFECTIVE

1 October 2026

WEBSITEwww.dohanyresidence.hu · www.dohanyresidence.com

This English version is a translation. In the event of any discrepancy between the English and the Hungarian versions, the Hungarian version shall prevail.

1 Introduction

1.1. PURPOSE OF THIS PRIVACY NOTICE

The purpose of this Privacy Notice (hereinafter: the “Notice”) is to set out transparently and in detail how we process personal data on the website of Dohány Residence Kft. (hereinafter: the “Controller”), and to provide information on the rights of data subjects and how to exercise them.

1.2. LEGAL COMPLIANCE

- ◆ **Regulation (EU) 2016/679 of the European Parliament and of the Council (GDPR):** lays down uniform EU rules on the protection of personal data.
- ◆ **Act CXII of 2011 (Infotv.):** the Act on the Right of Informational Self-Determination and on Freedom of Information, the basis of Hungarian data protection law.

This Notice seeks to comply with the requirements of the above legislation.

2 Details of the Controller

2.1. NAME AND CONTACT DETAILS OF THE CONTROLLER

- ◆ Name: **Dohány Residence Kft.**
- ◆ Registered office: **1055 Budapest, Balassi Bálint utca 19. félem. 2.**
- ◆ Company registration number: **01-09-964464**
- ◆ Tax number: **23412323-2-41**
- ◆ Represented by: **Thomas Schmidek, managing director**
- ◆ Email: dohanyresidence18kft@gmail.com

2.2. AVAILABILITY OF THIS PRIVACY NOTICE

This Notice is available in electronic form on the www.dohanyresidence.hu website, and its English translation on the www.dohanyresidence.com website.

3 Definitions

3.1. BASIC GDPR TERMS

- ◆ **Personal data:** any information relating to an identified or identifiable natural person ("data subject").
- ◆ **Controller:** the natural or legal person which determines the purposes and means of the processing of personal data.
- ◆ **Processor:** the natural or legal person which processes personal data on behalf of the Controller.
- ◆ **Consent:** a freely given and explicit indication of the data subject's wishes by which they signify agreement to the processing of personal data relating to them.
- ◆ **Data subject:** any identified or identifiable natural person to whom the personal data relate.

3.2. DEFINITION OF A PERSONAL DATA BREACH

A personal data breach is any event that results in the accidental or unlawful destruction, loss or alteration of, or unauthorised disclosure of or access to, personal data transmitted, stored or otherwise processed.

4 Data processing principles

4.1. PRINCIPLES

- ◆ **Lawfulness, fairness and transparency:** we process data only for specified and lawful purposes.
- ◆ **Purpose limitation:** only for purposes specified in advance, and only to the extent necessary to achieve them.
- ◆ **Data minimisation:** we collect and process only the personal data that are essential to achieve the purpose.
- ◆ **Accuracy:** we ensure that the personal data we process are accurate and, where necessary, kept up to date.
- ◆ **Storage limitation:** we store personal data only for as long as necessary to achieve the purpose.
- ◆ **Integrity and confidentiality:** we apply appropriate technical and organisational measures to protect personal data.

4.2. ACCURACY AND SECURITY OF DATA

- ◆ Both the Controller and the data subject are responsible for keeping the data up to date. The data subject may notify the Controller of any change in their personal data.
- ◆ The Controller makes every effort to keep the data it holds accurate, and protects them against unauthorised access with appropriate security measures.

5 Purposes and legal bases of processing

5.1. REGISTERING INTEREST BEFORE SALES OPEN

- ◆ **Purpose:** to contact the enquirer when sales open, at the contact details provided on the website's "Register your interest" form or by email.
- ◆ **Legal basis:** the data subject's consent (Article 6(1)(a) GDPR). The data subject gives consent on the form by ticking the checkbox "consent to the processing of my details so that I can be contacted when sales

open". The form cannot be submitted without consent.

- ◆ **Categories of data processed:** surname, first name, email address; if provided by the data subject: phone number and the purpose of interest (my own home, an investment, not yet decided). To follow up the contact, the Controller may also record a status, person responsible, next step, deadline and notes in the spreadsheet.
- ◆ **The route of the form data, step by step:**
 1. The enquirer completes and submits the website's "Register your interest" form.
 2. The website forwards the data by email through the system of RitArt Design Kft.: the email is sent from dohanyresidence@dropline.hu to the dohanyresidence@gmail.com mailbox.
 3. The Controller contacts the enquirer from this mailbox when sales open. The enquirer does not receive an automatic confirmation email.
- ◆ In addition to the email, the website also enters the submitted data in a Google spreadsheet, one row per enquirer. Besides the form data, each row contains the time of submission, the language of the website (Hungarian or English), the status of the two checkboxes (consent to data processing, newsletter) and whether the notification email was sent. The spreadsheet is stored by RitArt Design Kft. in its own Google Workspace account, and apart from RitArt Design Kft., only the Controller has access to it: the Controller can only read the data entered by the website, and can edit its own columns for handling enquiries (status, person responsible, next step, deadline, notes). The data remain in the spreadsheet for the same period as in the mailbox: until sales are completed or, if the data subject withdraws their consent earlier, until withdrawal. They are then deleted from the spreadsheet as well.
- ◆ No personal data from the form are recorded in the hosting log. A copy of the sent email is kept in the mail of RitArt Design Kft., among its sent emails. The service sending the email and the spreadsheet are described in Section 10.2.
- ◆ **Direct email:** if the enquirer writes directly to dohanyresidence@gmail.com, their email arrives directly in the Controller's mailbox.
- ◆ **Duration:** until sales are completed or, if the data subject withdraws their consent earlier, until withdrawal.

5.2. INFORMATION ON FURTHER PROJECT NEWS (NEWSLETTER)

- ◆ **Purpose:** to provide information by email about further news of the Dohány Residence project.
- ◆ **Legal basis:** the data subject's consent (Article 6(1)(a) GDPR), given on the form by means of a separate checkbox that is unticked by default. This consent is not a condition of registering interest under Section 5.1.
- ◆ **Categories of data processed:** name, email address.
- ◆ **Unsubscribing:** every newsletter email includes an unsubscribe option. Consent may also be withdrawn at any time by email to dohanyresidence18kft@gmail.com.

5.3. TECHNICAL OPERATION OF THE WEBSITE

- ◆ **Purpose:** serving the website, remembering the language chosen by the visitor (Hungarian or English), and remembering how the visitor decided on measurement cookies in the bar at the bottom of the page.
- ◆ **Legal basis:** legitimate interest (Article 6(1)(f) GDPR), in the case of technical processing that is essential for the website to function.
- ◆ **Categories of data processed:** when the website is displayed, the hosting provider's servers receive technical data (for example IP address, browser type). The hosting provider keeps a log of the requests

served (for example the address of the requested page, the time, the browser type, the serving region). Under the current subscription plan, the website operator can access this log for 1 hour. The website stores the language setting and the decision made in the bar in the visitor's browser; the Cookie Notice describes this in detail.

5.4. DISPLAY OF THE MAP

- ◆ **Purpose:** showing the location of the project and its surroundings on a map.
- ◆ **How it works:** when the map loads, the visitor's browser requests the map tiles from an external provider, which thereby receives the visitor's IP address. The map tiles are provided by the OpenFreeMap service, operated by Hyperknot Software Kft. (see Section 10.3).

5.5. VISITOR MEASUREMENT AND ADVERTISING MEASUREMENT

- ◆ **Purpose:** measuring visits to and use of the website with the Google Analytics 4 service and, if advertising runs for the website, measuring the results of the ads. The measurement codes are loaded onto the website by Google Tag Manager.
- ◆ **Legal basis:** the data subject's consent (Article 6(1)(a) GDPR). Under Section 155(4) of Act C of 2003 on Electronic Communications (Eht.), consent is also required for storing cookies and similar identifiers in the visitor's browser.
- ◆ **How it works:** when the website is opened, a bar at the bottom of the page asks for the visitor's consent. If the visitor accepts, the measurement codes are loaded. If the visitor declines, the measurement codes are not loaded and no measurement or advertising cookie is placed in their browser. With the "Settings" button, the visitor can decide on statistics and advertising measurement separately. The visitor can change or withdraw their decision at any time via the "Cookie settings" link at the bottom of the page. On withdrawal, the website deletes the measurement and advertising cookies. The decision is valid for 12 months, after which the website asks again.
- ◆ **Categories of data processed:** the identifiers stored in the measurement cookies, the pages viewed and the actions taken on the site (for example submitting the form), and technical data of the browser and the device.
- ◆ **Advertising measurement:** possible platforms are Google Ads and Meta (Facebook, Instagram).
- ◆ **Further details:** the list of cookies is in the Cookie Notice, and the providers are in Section 10.4.

6 Categories of data processed

6.1. TYPES OF PERSONAL DATA

- ◆ **Identification data:** surname, first name.
- ◆ **Contact data:** email address, phone number (if provided by the data subject).
- ◆ **Data relating to the enquiry:** the purpose of interest (if provided by the data subject).
- ◆ **Data recorded by the Controller:** status, person responsible, next step, deadline, notes (in the spreadsheet, to follow up the contact).
- ◆ **Technical data:** IP address, browser type.

6.2. METHOD AND PERIOD OF DATA STORAGE

- ◆ In electronic form, in the Controller's dohanyresidence@gmail.com mailbox, and in a spreadsheet stored in the Google Workspace account of RitArt Design Kft., which the Controller can also access (Section 5.1).

- ◆ Storage period: until sales are completed or, if the data subject withdraws their consent earlier, until withdrawal. After that, we delete the data from both the mailbox and the spreadsheet.

7 Rights of data subjects

7.1. RIGHT TO INFORMATION

The data subject is entitled to request information on the purpose, legal basis, source and duration of our processing of personal data relating to them, and on who may access the data.

7.2. RIGHT TO RECTIFICATION

If the data subject considers that the personal data processed about them are inaccurate or incomplete, they may request their rectification or completion.

7.3. RIGHT TO ERASURE ("RIGHT TO BE FORGOTTEN")

The data subject may request the erasure of their personal data if the data are no longer needed for their original purpose, or if they withdraw their consent and there is no other legal basis for the processing.

7.4. WITHDRAWAL OF CONSENT

The data subject may withdraw their consent at any time by email to dohanyresidence18kft@gmail.com. Withdrawal does not affect the lawfulness of processing carried out before the withdrawal.

7.5. RIGHT TO DATA PORTABILITY

The data subject is entitled to receive the data they have provided in a commonly used, machine-readable format, and may request that these data be transmitted to another controller.

7.6. RIGHT TO OBJECT

- ◆ The data subject may object at any time to the processing of their personal data where the legal basis of the processing is the Controller's legitimate interest.
- ◆ The data subject is separately entitled to object to the processing of personal data for direct marketing purposes.

8 Data security

- ◆ The website is accessible via an encrypted (HTTPS) connection.
- ◆ The mailbox storing the enquirers' data is protected by two-step verification.

9 Handling of personal data breaches

9.1. NOTIFICATION OF THE BREACH TO THE AUTHORITY

In the event of a personal data breach, the Controller notifies the Hungarian National Authority for Data Protection and Freedom of Information (NAIH) without undue delay and, where feasible, within 72 hours at the latest, unless the breach is unlikely to result in a risk to the rights and freedoms of data subjects.

9.2. INFORMING DATA SUBJECTS IN THE EVENT OF HIGH RISK

If the breach is likely to result in a high risk to the rights and freedoms of data subjects, the Controller also informs the data subjects without delay, describing the nature of the breach and the measures taken.

10 Processors and third parties

10.1. HOSTING PROVIDER

- ◆ Name: **Vercel Inc.**
- ◆ Registered office: **440 N Barranca Avenue #4133, Covina, CA 91723, United States of America**
- ◆ Processing activity: hosting and serving the website (content delivery). In doing so, it keeps a log of the requests made to the website.

10.2. FORWARDING AND STORAGE OF FORM DATA

- ◆ Name: **RitArt Design Kft.**
- ◆ Registered office: **1134 Budapest, Róbert Károly körút 47. 3. em. 308.**
- ◆ Company registration number: **01-09-299468**
- ◆ Tax number: **25974117-2-41**
- ◆ Represented by: **Márk Horváth**
- ◆ Processing activity: operating the website, forwarding the data submitted on the form by email to the Controller's mailbox and storing them in a spreadsheet (Section 5.1), and setting up and managing the website's measurement tools (Google Tag Manager, Google Analytics 4).
- ◆ Service sending the emails and storing the spreadsheet: **Google Cloud EMEA Limited** (Google Workspace), 70 Sir John Rogerson's Quay, Dublin 2, Ireland. RitArt Design Kft. sends the emails from its Google Workspace account, from the address dohanyresidence@dropline.hu. A copy of each sent email is also kept in the account's Sent folder. The spreadsheet is in the same account, in the Google Sheets service.

10.3. MAP

- ◆ Name: **Hyperknot Software Kft.** (operator of the OpenFreeMap service)
- ◆ Registered office: **2724 Újlengyel, Petőfi Sándor utca 48.**
- ◆ Activity: serving the tiles of the map on the website. When the map loads, it receives the visitor's IP address. According to its own privacy notice, it does not log IP addresses by default and does not place cookies. To investigate a security incident, it may log IP addresses for up to 30 days, and it may also use the Cloudflare service to deliver content.

10.4. MEASUREMENT AND ADVERTISING

Google Tag Manager and Google Analytics 4

- ◆ Name: **Google Ireland Limited**
- ◆ Registered office: **Gordon House, Barrow Street, Dublin 4, Ireland**
- ◆ Activity: loading the measurement codes (Google Tag Manager) and measuring visits to the website (Google Analytics 4), subject to the visitor's consent.

Advertising measurement

- ◆ Google Ads: **Google Ireland Limited**, Gordon House, Barrow Street, Dublin 4, Ireland
- ◆ Meta (Facebook, Instagram), Meta Pixel: **Meta Platforms Ireland Limited**, Block J, Serpentine Avenue, Dublin 4, Ireland. Meta processes the measurement and analytics data on behalf of the Controller under its terms. The Controller and Meta are joint controllers (Article 26 GDPR) for the collection of data on actions taken on the website and their transmission to Meta.

10.5. OTHER PARTNERS

Apart from the Controller, enquirers' data reach only RitArt Design Kft. (which, as a marketing agency, forwards them and stores them in the spreadsheet) and the service providers it uses for this purpose (Sections 10.1 and 10.2). The Controller does not transfer them to any other partner.

The Controller concludes written contracts with processors in accordance with the requirements of the GDPR. The contracts stipulate that the partners may process the data only on the Controller's instructions, for the specified purpose and for the necessary period.

According to its own notice, Google LLC has certified that it complies with the principles of the EU-U.S. Data Privacy Framework.

11 Cookies and data stored in the browser

- ◆ With the visitor's consent, the website places statistics (Google Analytics 4) and advertising cookies, which are loaded by Google Tag Manager (Section 5.5). Without consent, no such cookie is placed in the browser.
- ◆ To function, the website stores two settings in the visitor's browser: the chosen language and the decision made in the bar at the bottom of the page. These do not contain personal data.
- ◆ Details: see the Cookie Notice.

12 Data protection officer

The Controller has not appointed a data protection officer.

13 Remedies available to data subjects

13.1. COMPLAINT TO THE HUNGARIAN NATIONAL AUTHORITY FOR DATA PROTECTION AND FREEDOM OF INFORMATION (NAIH)

If the data subject considers that the processing of their personal data infringes the applicable legislation, they may lodge a complaint with the Hungarian National Authority for Data Protection and Freedom of Information (Nemzeti Adatvédelmi és Információszabadság Hatóság):

- ◆ Address: 1055 Budapest, Falk Miksa utca 9-11.
- ◆ Phone: +36 (1) 391-1400
- ◆ Email: ugyfelszolgalat@naih.hu

13.2. JUDICIAL REMEDY

If their rights are infringed, the data subject may turn to the courts. At the data subject's choice, the action may also be brought before the regional court (törvényszék) competent for their place of residence or place of stay.

14 Legislation underlying the processing

14.1. GDPR (REGULATION (EU) 2016/679)

Regulation (EU) 2016/679 of the European Parliament and of the Council, which aims to protect natural persons with regard to the processing of personal data and to ensure the free movement of data within the EU.

14.2. ACT CXII OF 2011 ON THE RIGHT OF INFORMATIONAL SELF-DETERMINATION AND ON FREEDOM OF INFORMATION

The Hungarian data protection act, which sets out the national principles and limits of the processing of personal data.

14.3. OTHER RELEVANT HUNGARIAN LEGISLATION

- ◆ Act V of 2013 on the Civil Code (Ptk.)
- ◆ Act XLVIII of 2008 on the Basic Requirements and Certain Restrictions of Commercial Advertising Activities (relevant because of the newsletter)

15 Final provisions

- ◆ This Notice is effective from 1 October 2026.
- ◆ The Controller is entitled to amend this Notice unilaterally, in particular to reflect changes in legislation, the introduction of new processing activities or the recommendations of the supervisory authority. Amendments will be published on the website.

Dated: Budapest, 1 October 2026

Dohány Residence Kft.

Represented by: Thomas Schmidek, managing director