

PRIVACY POLICY EFFECTIVE: 2026

1. The Data Controller

Saját Otthon Kft (registered office/official mailing address: 1039 Budapest, Pünkösdfürdő u. 42-46, Building C, 5/505; company registration number: Cg:01-09-194419; email:sajatotthon@sajatotthon.com ; website: www.sajatotthon.com; phone number: +36 706118504, hereinafter: **Data Controller**) hereby informs users of its services about the data processing it performs, in accordance with the relevant legal provisions governing the protection of personal data.

The Data Controller places particular emphasis on the protection of personal data and therefore always ensures fair and transparent data processing, a fundamental requirement of which is the provision of adequate information regarding the processing of data. This Privacy Notice provides, among other things, information regarding the processing of your personal data in connection with the provision of the Data Controller's services and for advertising purposes: the sources and scope of the processed data, the legal basis, purpose, and duration of data processing, the rights related to personal data and the options available to you, and it also includes the contact information where you can obtain answers to your questions regarding the Data Controller's data protection practices.

2. Definitions

Property Owner (Seller/Landlord): A person who is the owner of the property brokered by the Data Controller, or the holder of a property right (e.g., usufruct) pertaining to the property, or who has entered into a brokerage agreement with the Data Controller for the brokerage of the property, as well as their authorized representative.

Offeror (buyer/tenant): A person who has made an offer to purchase or rent the real estate brokered by the Data Controller.

Viewer: A person who has viewed the property brokered by the Data Controller or to whom the Data Controller has provided the exact address of the brokered property.

Property Seeker: In addition to the above, a person who, within the scope of the Data Controller's real estate brokerage activities, requests information from the Data Controller in person, by phone, electronically, or by other means, or inquires with the Data Controller, including, in particular, contacting the Data Controller for the purpose of expressing interest in selling or purchasing, or who registers with the Data Controller as a property seeker.

Newsletter Subscriber: A person who has subscribed to the Data Controller's newsletter service.

User of assistance services: A person who has used an assistance service available on the website.

Job applicant: A data subject who has applied for a job opening advertised by the Data Controller.

Data Subject: Individuals affected by the data controller's processing of personal data, including users of the data controller's various services: Property owner, Bidder, Property seeker, Newsletter subscriber, User of assistance services, Job applicant, and anyone who places a valuation order with the Data Controller.

3. Purpose of data processing

- 3.1. *For Property Seekers:* To search for and recommend properties that meet the criteria specified by the Data Subject for the purpose of purchase or rental, and to establish a connection between the party wishing to sell or rent the property and the Data Subject.
- 3.2. *For viewers:* To enable the Data Controller to show the property sought by the Data Subject that meets the specified criteria for the purpose of purchase or rental.
- 3.3. *In the case of a property owner:* To fulfill the brokerage agreement established between the Data Subject and the Data Controller, under which the Data Controller facilitates the sale or rental of the property by sharing the property's details with other real estate agents and/or displaying them on various advertising platforms.
- 3.4. *In the case of customer due diligence obligations:* Fulfilment of the customer due diligence obligations incumbent upon the Data Controller. Fulfilment of the legal obligation applicable to the Data Controller [GDPR Article 6(1)(c)] and Sections 6–9 of Act LIII of 2017 on the Prevention and Combating of Money Laundering and Terrorist Financing (Pmt.).
- 3.5. *In the case of a Bidder:* recording a purchase/lease offer for the real estate brokered by the Data Controller and forwarding it to the Property Owner.
- 3.6. *In the case of a valuation:* Performance of the contract for services regarding the valuation concluded between the Data Subject and the Data Controller.
- 3.7. *In the case of newsletter distribution:* Sending newsletters containing professional information regarding the real estate market and, as part of the Data Controller's advertising activities, newsletters containing special offers, promotions, and offers.
- 3.8. *In the case of fulfilling accounting obligations:* Fulfilling the Data Controller's obligation to retain records.
- 3.9. *In the case of job applicants:* Evaluating applicants for job openings at the Data Controller.

4. Legal basis for data processing

- 4.1. *For property searchers:* The Data Controller's legitimate interest [GDPR Article 6(1)(f)]. The Data Controller's legitimate interest is to provide a high-quality service related to property searches, ensure customer satisfaction with the service, and thereby increase its revenue.
- 4.2. *For viewers:* Legitimate interest of the Data Controller [GDPR Article 6(1)(f)]. It is in the Data Controller's legitimate interest to provide high-quality real estate search services, ensure customer satisfaction with these services, and thereby increase its business by presenting properties to prospective buyers.
- 4.3. *For property owners:* Performance of a contract [GDPR Article 6(1)(b)].
- 4.4. *In the case of customer due diligence obligations:* Compliance with a legal obligation to which the data controller is subject [GDPR Article 6(1)(c)] and Sections 6–9 of Act LIII of 2017 on the Prevention and Combating of Money Laundering and Terrorist Financing (Pmt.).

4.5. *In the case of the Bidder*: Data processing necessary for steps prior to entering into a contract [GDPR Article 6(1)(b)].

4.6. *In the case of valuation*: Performance of a contract [GDPR Article 6(1)(b)].

4.7. *In the case of newsletter distribution*: Consent [GDPR Article 6(1)(a)].

4.8. *In the case of compliance with accounting obligations*: Compliance with a legal obligation to which the controller is subject [GDPR Article 6(1)(c)] and Section 169 of Act C of 2000 on Accounting.

4.9. *In the case of job applicants*: Consent of the data subject [GDPR Article 6(1)(a)].

5. Scope of processed data

5.1. *For property searchers*: name, address (if provided by the data subject), phone number, email address, and data provided by the data subject regarding the property being searched for [e.g., purchase price of the property, location, type, orientation, usable floor area, construction method, comfort level, heating method, number of rooms, and lot area], payment schedule (ratio of down payment to loan).

5.2. *For viewers*: name, place and date of birth, mother's maiden name, address, phone number, email address, and data necessary for the precise identification of the viewed property.

5.3. *For property owners*: name, place and date of birth, mother's maiden name, address, or, if unavailable, current residence, phone number, email address, information provided regarding the property [e.g., photograph of the property, floor plan, general description of the property, purchase price of the property, location of the property, type, orientation, usable floor area, construction method, comfort level, heating method, number of rooms, and lot area].

5.4. *In the case of customer due diligence obligations*: first and last name, birth name, citizenship, place and date of birth, mother's maiden name, residential address, or, in the absence thereof, place of residence, type and number of identification document and a copy thereof, declaration regarding prominent public figures, and a declaration indicating the source of the purchase price.

5.5. *For bidders*: name, place and date of birth, mother's maiden name, residential address, or, in the absence thereof, place of residence, telephone number, email address, bid amount, and terms of payment.

5.6. *In the case of a valuation*: name, place and date of birth, mother's maiden name, residential address, or, in the absence thereof, place of residence, telephone number, email address, data provided regarding the property [e.g., photographs of the property, floor plan, general description of the property, purchase price of the property, location of the property, type, orientation, usable floor area, construction method, comfort level, heating method, number of rooms, and lot area].

5.7. *For newsletter subscriptions*: name, business email address.

5.8. *For the fulfillment of accounting obligations*: Accounting documents supporting bookkeeping entries

5.9. *For job applicants*: name, place and date of birth, address, phone number, email address, and other information provided in the resume.

6. Duration of data processing

- 6.1. *For property seekers:* 5 years from the date of recording personal data.
- 6.2. *For property viewers:* 5 years from the date of recording personal data.
- 6.3. *For property owners:* 5 years from the termination of the contract.
- 6.4. *For customer due diligence obligations:* 8 years from the date of recording of personal data.
- 6.5. *For bidders:* 5 years from the date of recording of personal data.
- 6.6. *In the case of property appraisals:* 5 years from the termination of the contract.
- 6.7. *In the case of newsletter distribution:* until the Data Subject withdraws their consent.
- 6.8. *Accounting obligations* : : the Data Controller is required to retain personal data related to the fulfillment of its record retention obligation for eight years.
- 6.9. *In the case of job applicants:* one year from the date of recording.

7. Recipients of personal data, categories of recipients, disclosure, and creation of statistical databases

7.1 *[Data Processors]* The Data Controller transfers the Data Subject's data to its contracted partners (including private individuals) for data processing during the provision of the service, for the purpose of fulfilling the service, and to the extent necessary for that purpose. For the purpose of fulfilling the provision of the service.

7.2. *[Transfer of Personal Data]* In addition to its real estate brokerage activities, the Data Controller assists Data Subjects with services provided by other data controllers that the Data Subject may require. In such cases, the Data Controller provides the Data Subject's contact information (typically name, address, email address, and phone number) to service providers, which may include: a mortgage broker, an appraiser, a lawyer, a professional authorized to issue energy performance certificates, or a company that creates 3D scans of real estate. The Data Controller receives precise information regarding the service provider's name and contact details during the data transfer.

In the case of Data Subjects who are property owners, data is collected for statistical purposes and transferred.

7.3. *[Disclosure of Personal Data]* The Data Controller notes that, in order to facilitate the sale of the property, the data provided regarding the property [e.g., photographs of the property, floor plan, property description, purchase price, location, type, orientation, usable floor area, construction method, comfort level, heating method, number of rooms, and lot area] will be published on various online advertising platforms.

7.4 *[Creation of a statistical database]* In order to provide more effective customer service, increase sales efficiency, and ensure more appropriate pricing and high-quality appraisal services, the Data Controller also uses property data for statistical and sales purposes to create a statistical database.

The following data is used for the creation of the statistical and sales database: regarding the property's location: ZIP code, municipality/district, name of the public area, floor; the building's levels; the property type (single-family home, condominium, land parcel), property location (urban area, rural area); construction condition; lot area; interior area (usable floor area); number of rooms; construction method (brick, prefabricated, mixed, other construction methods); comfort level; heating method; year of construction; exterior and interior condition of the property; floor plan; photographs of the property; date of sale; sale price; additional features and amenities; ad text.

Please note that data regarding the exact address of the property—including the house number and cadastral number—will not be disclosed.

8. Security of personal data and the scope of persons with access to personal data

8.2. The Data Controller ensures the security of the processed data and takes all measures to prevent unauthorized access, alteration, disclosure, deletion, or destruction, as well as accidental destruction and damage, and inaccessibility resulting from changes in the technology used, i.e., to ensure that the Data Subjects' personal data are protected in accordance with the law.

8.3. To meet data security requirements, the Data Controller processes the Data Subject's data in a computerized database using both automated and manual methods, and has ensured that the processing of the Data Subject's data is conducted in a closed system that is password-protected at all times, stored on a hard drive, and that these systems are used only in connection with the provision of the service, to the extent strictly necessary, by those authorized to access the data.

8.4. Those authorized to access personal data are the Data Controller's employees and its contractual partners involved in the provision of its services.

8.5. The Data Controller ensures that those authorized to access the data are fully informed of data protection rules. As a data security guarantee, the Data Controller, its employees, and its contractual partners involved in the provision of its services are bound by a duty of confidentiality and legal liability regarding the personal data they become aware of in the course of their activities.

9. Your rights and the rules governing the exercise of those rights

9.1. Upon the Data Subject's request, the Data Controller shall provide information in writing or electronically [GDPR Article 15(1); right to information]:

- what data we process about you,
- the purposes of the data processing,
- the categories of recipients to whom we may disclose personal data,
- the duration of the data processing,
- your rights and the available remedies.

9.2. Before initiating the procedures set forth in this section, the Data Subject has the right to submit a complaint—which may be filed electronically—to the Data Controller in order to resolve any concerns regarding data processing and to restore compliance with the law. The Data Controller shall review the complaint within one month, make a decision regarding its merits, and notify the Data Subject of its decision in writing via electronic means. If the Data Controller determines that the Data Subject's complaint is well-founded, it shall restore the lawful status of data processing or cease data processing—including further data collection and data transfer. In such a case, the Data Controller may no longer process the Data Subject's data, unless the Data Controller demonstrates that the data processing

is justified by compelling legitimate grounds that override the interests, rights, and freedoms of the Data Subject, or that are related to the establishment, exercise, or defense of legal claims. The Data Controller shall notify those to whom the data subject to the complaint has been disclosed of the complaint and the measures taken in response.

9.3. At the Data Subject's request, the Data Controller shall provide a copy of the personal data in a commonly used electronic format or in another format chosen by the Data Subject. [GDPR Article 15(3); right of access, right to receive a copy].

9.4. We will amend and correct your personal data in accordance with your request. [GDPR Article 16; right to rectification]. To exercise your right of access to your data and to request the rectification of your personal data, you may contact the Data Controller by sending an email to sajatotthon@sajatotthon.com.

9.5. At the Data Subject's request, the Data Controller shall erase the Data Subject's personal data. The Data Controller may refuse to comply with the request for the reasons set forth in Article 17(3) of the GDPR, such as when the personal data is necessary for the establishment or exercise of legal claims, or for compliance with a legal obligation under Union or Member State law to which the Data Controller is subject, or for reasons of public interest, or for the exercise of the right to freedom of expression and information. [GDPR Article 17; Right to erasure].

9.6. The Data Subject may withdraw their consent at any time, without restriction or justification, free of charge, or may request that the sending of advertisements be prohibited. In this case, the Data Controller shall immediately delete the Data Subject's name and all other personal data from the records. The statement of withdrawal may be submitted either by mail, via a letter sent to the Data Controller's registered office, or electronically by sending an email to sajatotthon@sajatotthon.com [right to withdraw consent]. The withdrawal does not affect the lawfulness of data processing carried out on the basis of consent prior to the withdrawal.

9.7. The Data Subject has the right to request the restriction (blocking) of the processing of personal data

- if the Data Subject disputes the accuracy of the personal data, they may request that the data be blocked for the period during which the Data Controller verifies the accuracy of the personal data;
- if the data processing is unlawful, and the Data Subject opposes the erasure of the personal data and instead requests the restriction of its use;
- The Data Controller no longer needs the personal data, but the Data Subject requests the blocking of the data for the purpose of establishing, exercising, or defending legal claims [GDPR Article 18; right to restriction of processing (blocking)]
- The Data Controller fulfills the request for blocking by storing the personal data separately from all other personal data. For example, in the case of electronic data files, it is exported to an external data storage device, or personal data stored on paper is transferred to a separate folder. Except for storage, the Data Controller shall process the data only with the Data Subject's consent, or for the purpose of asserting, exercising, or defending legal claims, or to protect the rights of another natural or legal person, or for reasons of substantial public interest of the Union or of a Member State. We will provide advance notice of the lifting of this restriction on data processing.

9.8. The Data Subject has the right to receive their personal data in a commonly used, machine-readable, structured format, and has the right to transmit this data to another data controller. Furthermore, the Data Controller ensures that, upon the Data Subject's explicit request, it will directly transmit the Data Subject's data to another data controller designated by the Data Subject. [GDPR Article 20(1) and (2); right to data portability].

9.9. The Data Subject has the right to object at any time to the processing of their personal data based on the legal ground of balancing of interests [GDPR Article 6(1)(f)]. In the event of an objection, the Data Controller shall assess whether, based on the facts and arguments cited by the employee, the Data Controller has the option to erase the personal data or cease processing.

9.10. The Data Controller shall inform the Data Subject of the measures taken within one month of receiving the Data Subject's request. If the request is denied, the Data Controller will inform you within one month of receiving the request of the reasons for the denial, as well as of your right to file a complaint with the Authority and to seek judicial remedy.

9.11. The exercise of these rights is free of charge. In certain cases, the Data Controller may charge a fee based on administrative costs or may refuse to take action on the request if the Data Subject requests a copy of their data, or if the Data Subject's request is manifestly unfounded or excessive (particularly due to its repetitive nature).

9.12. The Data Controller reserves the right, if it has reasonable doubts regarding the identity of the person submitting the request, to request the provision of information necessary to confirm the Data Subject's identity. This applies in particular when the Data Subject exercises their right to request a copy, in which case it is reasonable for the Data Controller to verify that the request originates from the authorized person.

10. Your options for enforcing your rights

If you believe that the data processing does not comply with legal requirements, you may initiate proceedings with the National Authority for Data Protection and Freedom of Information (Mailing address: 1363 Budapest, P.O. Box 9, email address: ugyfelszolgalat@naih.hu). If you believe that the Data Controller has violated your right to the protection of personal data, you may file a lawsuit and initiate proceedings before the court with jurisdiction over your place of residence or current location.