

# PRIVACY NOTICE

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## 1. Introduction

The purpose of this Privacy Notice is to explain how Whitefield Management Kft. (hereinafter referred to as the “Data Controller”) processes the personal data of visitors and users (hereinafter referred to as the “Data Subject”) of the website [www.samuelgarden.hu](http://www.samuelgarden.hu).

## 2. Applicable Data Protection Laws

The following laws and regulations serve as the basis for the data processing described in this notice, with their respective abbreviations as used herein:

- 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, and repealing Directive 95/46/EC (General Data Protection Regulation, hereinafter: GDPR)
- Act CXII of 2011 on the Right to Informational Self-Determination and Freedom of Information (hereinafter: Info Act)

## 3. Data Controller Information

The Data Controller informs the Data Subject that it qualifies as the data controller in relation to the processing of personal data.

Company name: Whitefield Management Ingatlanforgalmazó Korlátolt Felelősségű Társaság

Registered seat: 1204 Budapest, Mártírok útja 290.

Company registration number: 01-09-881579

Tax number: 13953276-2-43

Phone: +36 1 421 0278

Representative: Asaf Samet

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

Website: [www.samuelgarden.hu](http://www.samuelgarden.hu)

Personal data may be accessed by employees of the Data Controller who have the appropriate access rights for the relevant processing purposes, to the extent necessary for the performance of their duties and within the scope defined by the Data Controller.

#### **4. Definitions and Basic GDPR Concepts**

- Personal data: any information relating to an identified or identifiable natural person ("data subject"); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

- Processing: any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

- Controller: the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.

- Data subject's consent: any freely given, specific, informed and unambiguous indication of the data subject's wishes by which they, by a statement or by a clear affirmative action, signify agreement to the processing of personal data relating to them.

#### **5. Legal Basis, Purpose, and Duration of Data Processing**

##### **5.1. Legal Basis for Data Processing**

The legal basis for the Data Controller's data processing is the data subject's voluntary consent (Article 6(1)(a) of the GDPR). The data subject (the individual who contacts the Data Controller and provides their personal data) gives consent to data processing by checking the checkbox on the website during registration or when submitting a request for proposal. The data subject has the right to withdraw their consent at any time. Withdrawal of consent does not affect the lawfulness of processing based on consent before its withdrawal.

If the data subject provides personal data not belonging to themselves, they are required to obtain the data subject's consent.

## 5.2. Purpose of Data Processing

The Data Controller processes the personal data primarily for the purposes of facilitating communication with potential clients interested in purchasing properties featured on the website and related services, as well as sending personalized offers via newsletter. Data may also be used to generate statistics and reports from aggregated and anonymized data.

The Data Controller ensures the security and protection of personal data, particularly against unauthorized access, alteration, transmission, disclosure, deletion, destruction, accidental loss, damage, or becoming inaccessible. The data provided by the data subject will not be disclosed to third parties, transferred to third countries, or international organizations.

## 5.3. Duration of Data Processing

The Data Controller retains personal data for one year from the date of registration or request for proposal. After this period, the personal data will be deleted.

## 6. Processed Data

- First name and last name
- Email address
- Phone number
- Cookie(s)\* (automatically stored during website visit)

\* The samuelgarden.hu website uses anonymous visitor identifiers (cookies), which are unique character strings placed on the user's device to identify or store profile information. These identifiers cannot identify the visitor by themselves, only the device being used.

By registering or submitting a request for proposal and checking the "I have read and accept the Privacy Policy" checkbox, you consent to the use of your data for the purposes described in this Privacy Notice.

If the data subject subscribes to our newsletter on the website, checking the “Subscribe to newsletter” checkbox constitutes consent to receive personalized offers from the Data Controller.

## **7. Rights of the Data Subject and Legal Remedies**

### **7.1. Right to Information**

The Data Controller shall take appropriate measures to provide the Data Subject with all the information referred to in Articles 13 and 14 of the GDPR and any communication under Articles 15 to 22 and 34 in a concise, transparent, intelligible and easily accessible form, using clear and plain language.

### **7.2. Right of Access**

The Data Subject has the right to obtain confirmation from the Data Controller as to whether or not personal data concerning them is being processed, and, where that is the case, access to the personal data and the following information:

- purposes of the processing;
- categories of personal data concerned;
- recipients or categories of recipients to whom the personal data have been or will be disclosed;
- envisaged period for which the personal data will be stored;
- the right to request rectification or erasure or restriction of processing, or to object to such processing;
- the right to lodge a complaint with a supervisory authority;
- information as to the source of the data;
- the existence of automated decision-making, including profiling.

The Data Subject also has the right to obtain a copy of the personal data undergoing processing. For any further copies requested by the Data Subject, the Controller may charge a reasonable fee based on administrative costs.

### **7.3. Right to Rectification**

The Data Subject has the right to obtain without undue delay the rectification of inaccurate personal data concerning them and to have incomplete personal data completed.

#### 7.4. Right to Erasure

The Data Subject has the right to obtain from the Data Controller the erasure of personal data concerning them without undue delay, and the Controller shall have the obligation to erase personal data without undue delay where one of the following grounds applies:

- the personal data are no longer necessary in relation to the purposes for which they were collected or otherwise processed;
- the data subject withdraws consent and there is no other legal ground for the processing;
- the data subject objects to the processing and there are no overriding legitimate grounds;
- the personal data have been unlawfully processed;
- the personal data have to be erased for compliance with a legal obligation;
- the data have been collected in relation to the offer of information society services.

Erasure is not required to the extent processing is necessary for exercising the right of freedom of expression and information, compliance with a legal obligation, public interest, public health, archiving purposes, or legal claims.

#### 7.5. Right to Restriction of Processing

The Data Subject has the right to obtain restriction of processing where:

- the accuracy of the personal data is contested;
- the processing is unlawful but the data subject opposes the erasure;
- the controller no longer needs the personal data, but the data subject requires it for legal claims;
- the data subject has objected to processing pending the verification of legitimate grounds.

Where processing has been restricted, such data shall, with the exception of storage, only be processed with the data subject's consent or for legal claims or public interest. The Data Controller shall inform the data subject before lifting the restriction.

The Data Controller shall inform each recipient to whom personal data have been disclosed of any rectification or erasure or restriction unless this proves impossible or involves disproportionate effort. The data subject may request information about such recipients.

#### 7.6. Right to Data Portability

The Data Subject shall have the right to receive the personal data concerning them in a structured, commonly used, machine-readable format and to transmit those data to another controller without hindrance. This right shall not adversely affect the rights and freedoms of others.

#### 7.7. Right to Object

The Data Subject shall have the right to object at any time to processing of personal data concerning them which is based on public interest or legitimate interest, including profiling. The Data Controller shall no longer process the personal data unless it demonstrates compelling legitimate grounds which override the interests or rights of the Data Subject, or for legal claims.

#### 7.8. Right Not to Be Subject to Automated Decision-Making

The Data Subject shall have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects or similarly significantly affects them.

### **8. Legal Remedies**

#### 8.1. Complaints to Supervisory Authority

The Data Subject may file a complaint with the National Authority for Data Protection and Freedom of Information (address: 1055 Budapest, Falk Miksa utca 9-11., website: <http://naih.hu>; postal address: 1363 Budapest, Pf. 9.; phone: +36-1-391-1400; fax: +36-1-391-1410; email: [ugyfelszolgalat@naih.hu](mailto:ugyfelszolgalat@naih.hu)), if they believe a breach of data protection regulations has occurred or is imminent.

#### 8.2. Judicial Remedy

The Data Subject may also bring proceedings before a court against the Data Controller or, in matters within the processor's competence, the data processor. The burden of proving compliance with applicable laws lies with the Data Controller or processor. The action may be brought before the competent court of the Data Subject's place of residence or stay.

If the court upholds the claim, it may order the cessation of the unlawful processing, restoration of lawful conditions, or fulfillment of the data subject's rights, and may award damages or compensation. The court may also order the publication of the judgment if the case is of public interest or concerns a public authority. The Data Controller or processor shall be liable for damages caused by unlawful processing unless it proves the damage occurred due to an unforeseeable, unavoidable cause outside their control.

## **9. Final Provisions**

This Privacy Notice shall enter into force on 24 June 2025.

The Data Controller reserves the right to unilaterally amend this Privacy Notice, particularly to reflect legal changes. Amendments will be published on the website and shall be deemed accepted by the continued use of services by the Data Subject.